TREASURE ISLAND NAVAL STATION/ HUNTERS POINT ANNEX SUPERFUND SITE

San Francisco, California

PARTIAL SITE DELETION

HUNTERS POINT SHIPYARD PARCEL A

DELETION DOCKET & INDEX

December 4, 1998

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION IX

Innovative Technical Solutions, Inc.

February 2, 2004

Diane Silva
Naval Facilities Engineering Command
Southwest Division
1220 Pacific Highway, Building 127
San Diego, CA 92132

RE: Navy Administrative Record files

Dear Diane,

Enclosed, please find (4) reports

1. Basewide Env. Baseline Survey for Engineering Field Activity West – Final 6/3/96, Vol. 1 and 2
2. Draft Final – Basewide Finding of Suitability to Lease (excluding Parcel A), January 7, 1998 Record # 793
3. Treasure Island Naval Station/Hunters Point Annex Superfund Site, Parcel Site Deletion (Parcel A – Deletion Docket & Index) Record # 796
4. Public Information Materials from October 23, 2003 Record # 797

for inclusion in the Navy Administrative Record for Hunters Point Shipyard. These original reports were previously housed in the Anna Waden Branch Library (Info Repository) in San Francisco but are not listed on the most recent Admin Record Index. At the request of the HPS Lead RPM, these reports are being forwarded to you so that they become part of the Administrative Record. Photocopies of the reports have already been made by I.T.S.I. personnel and have been replaced in the IR.

If you have any questions, please contact Arvind Acharya at 415/657-0346 or Ronald Keichline at 619/666-1797.

Thank you,

Debra Moore
Community Relations Coordinator

/dm

Enclosures

1485 Bayshore Boulevard, Suite 355
San Francisco, CA 94124-3002

(415) 657-0346
fax (415) 657-0347
www.itsi.com

FACT SHEET

PARTIAL SITE DELETION

TREASURE ISLAND NAVAL STATION/HUNTERS POINT ANNEX SUPERFUND SITE
SAN FRANCISCO, CALIFORNIA

HUNTERS POINT SHIPYARD
PARCEL A
DELETION DOCKET

A Deletion Docket is a collection of documents containing all the pertinent information supporting the proposal by the U.S. Environmental Protection Agency (EPA) to delete all or part of a Superfund site from the National Priorities List (NPL). Under Section 105(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA), EPA is required to establish a list (referred to as the NPL) of priority releases for long-term remedial evaluation and response. Releases (i.e., Superfund sites) may be deleted or partially deleted from the NPL when no further response is appropriate. As part of any deletion process, EPA is required to place copies of information supporting a proposed deletion in the information repositories, where it will be available for public review and copying. A deletion docket may include, by reference, documents from the Administrative Record.

A deletion docket must be reasonably available for public review during normal business hours. It should be treated as a non-circulating reference document, in order to allow the public greater access to the docket and also to minimize the risk of loss or damage. Individuals may copy any documents contained in the docket, including documents which may be part of the existing administrative record, according to the copying procedures at the local repository.

A deletion docket will be maintained at the local repository until further notice. Questions regarding the maintenance of the deletion docket should be directed to:

Elaine Chan
Administrative Record Coordinator
U.S. Environmental Protection Agency
75 Hawthorne Street (SFD-7-B)
San Francisco, CA 94105
(415) 744-2380

Please address questions or comments on this deletion docket to:

Claire Trombadore
Remedial Project Manager
U.S. Environmental Protection Agency
75 Hawthorne Street (SFD-8-2)
San Francisco, CA 94105
(415) 744-2409 or leave a message at 1-800-231-3075

December 4, 1998

INTRODUCTION

PARTIAL SITE DELETION

TREASURE ISLAND NAVAL STATION/HUNTERS POINT ANNEX SUPERFUND SITE SAN FRANCISCO, CALIFORNIA

HUNTERS POINT SHIPYARD PARCEL A DELETION DOCKET

The Hunters Point Shipyard, Parcel A, Deletion Docket is a collection of documents containing all the pertinent information supporting the proposal by the U.S. Environmental Protection Agency (EPA) to delete from the National Priorities List the Hunters Point Shipyard, Parcel A portion of the Superfund site.

The index which follows lists the documents in chronological order. Each document has been assigned a unique number for the Deletion Docket.

This Hunters Point Shipyard, Parcel A, Deletion Docket references documents which have already been released in the site Administrative Record (AR), maintained by the Navy, at the San Francisco Public Library (Main Library and the Anna E. Waden Branch Library). For these AR documents only the title pages, the tables of contents and reference information to locate the complete documents have been included in this docket. The complete documents may be viewed at either of the libraries or at the EPA Superfund Records Center in San Francisco.

December 4, 1998

Treasure Island Naval Station/Hunters Pt Annex
San Francisco, California
PARCEL A DELETION DOCKET

IN CHRONOLOGICAL ORDER

DATE yy/mm/dd	DD#	AUTHOR	ADDRESSEE	SUBJECT
93/08/00	DD1	Tetra Tech, Inc	US Navy - Naval Facilities Engineering Command	Lead-based paint & soil sampling, parcel A (quarters)
93/10/15	DD2	P R C Environmental Management, Inc		Site inspection (SI), parcel A, draft final, main text, tables, & 3 plates (plates 1-3 missing)
93/10/15	DD3	P R C Environmental Management, Inc		Site inspection (SI), parcel A, draft final, appendices A-K (includes SI workplan, parcel A, addendum 3, results, draft final), with 2 plates
95/07/31	DD4	US Navy - Naval Facilities Engineering Command		Public notice: Public comment invited on proposed plan on preferred alternative for parcel A (mtg 8/22/95), w/TL fr W Radzevich to C Trombadore
95/07/31	DD5	US Navy - Naval Facilities Engineering Command		Mtg notice: Public mtg (8/22/95) for comment on proposed plan on preferred alternative for parcel A
95/08/00	DD6	US Navy - Naval Facilities Engineering Command		Fact sheet (draft final): Proposed plan, parcel A
95/08/22	DD7	Paul Schiller Mary Hillabrand, Inc		Mtg transcripts: Public mtg, proposed plan for parcel A
95/09/20	DD8	Richard Powell US Navy - Naval Facilities Engineering Command	Distribution List	TL: Remedial investigation (RI), parcel A, draft final
95/09/22	DD9	P R C Environmental Management, Inc	US Navy - Naval Facilities Engineering Command	Remedial investigation (RI), parcel A, draft final, with 5 plates & appendices A-L
95/09/22	DD10	P R C Environmental Management, Inc		Public summary, remedial investigation (RI), parcel A, draft final
95/11/28	DD11	Julie Anderson Environmental Protection Agency - Region 9		Record of decision (ROD), parcel A, with appendix (responsiveness summary) (OU1, ROD signature)
96/05/00	DD12	P R C Environmental Management, Inc	US Navy - Naval Facilities Engineering Command	Updated community relations plan, draft final, with appendices A-I

Treasure Island Naval Station/Hunters Pt Annex
San Francisco, California
PARCEL A DELETION DOCKET

IN CHRONOLOGICAL ORDER

DATE yy/mm/dd	DD #	AUTHOR	ADDRESSEE	SUBJECT
96/12/00	DD13	P R C Environmental Management, Inc	US Navy - Naval Facilities Engineering Command	Updated community relations plan, draft final, w/o appendices A-I
98/03/10	DD14	International Technology Corp	US Navy - Naval Facilities Engineering Command	Supplemental soil-lead sampling, parcel A, summary rpt, with appendices A-E
98/06/26	DD15	Dan Murphy CA Environmental Protection Agency - Dept of Toxic Substances Control	Dennis Mishek CA Regional Water Quality Control Board - San Francisco Bay Region	Ltr: Notification of petroleum contamination (outside of DTSC oversight authority) at parcel A, w/suggested items for parcel A deed notifications
98/06/30	DD16	Anthony Landis CA Environmental Protection Agency - Dept of Toxic Substances Control	Michael McClelland US Navy - Naval Facilities Engineering Command	Ltr: Certification of completion of remedial actions at parcel A as required by ROD of 11/16/95
98/08/26	DD17			Mtg minutes (draft): Restoration Advisory Board (RAB), includes discussion of removal of parcel A from NPL, w/agenda
98/09/24	DD18	Dan Opalski Environmental Protection Agency - Region 9	Anthony Landis CA Environmental Protection Agency - Dept of Toxic Substances Control	Ltr: Requests DTSC concurrence on decision to delete parcel A from NPL, w/draft notice of intention for partial deletion (NOID)
98/10/28	DD19	Anthony Landis CA Environmental Protection Agency - Dept of Toxic Substances Control	Dan Opalski Environmental Protection Agency - Region 9	Ltr: DTSC concurs on deletion of parcel A from NPL
98/11/00	DD20			Map: Parcel A partial deletion (GIS) map (scale 1:12000 feet)
98/11/06	DD21	US Navy - Naval Facilities Engineering Command		Revised response to EPA, DTSC & SFDPH comments on draft finding of suitability to transfer (FOST), parcel A, w/TL fr R Powell to Distribution List
98/11/12	DD22	Claire Trombadore Environmental Protection Agency - Region 9		Partial NPL site deletion, data collection form, parcel A

Treasure Island Naval Station/Hunters Pt Annex
San Francisco, California
PARCEL A DELETION DOCKET

IN CHRONOLOGICAL ORDER

DATE yy/mm/dd	DD #	AUTHOR	ADDRESSEE	SUBJECT
98/11/25	DD23	Claire Trombadore Environmental Protection Agency - Region 9		Memo: Re EPA headquarters approval of no-action ROD as equivalent to close-out rpt for partial site deletion, parcel A, Hunters Point Shipyard

No. of Records:23
\arfincm2.rpt

TC 9553-03

DD 1

LEAD-BASED PAINT AND SOIL SAMPLING:

PARCEL "A" QUARTERS HUNTERS POINT NAVAL BASE

Contract No. N62474-90-D-1400
Delivery Order: 0010

Prepared for:

Western Division Naval Facilities Engineering Command
San Bruno, CA

August 1993

Prepared by:

Tetra Tech
180 Howard Street, Suite 250
San Francisco, CA 94105

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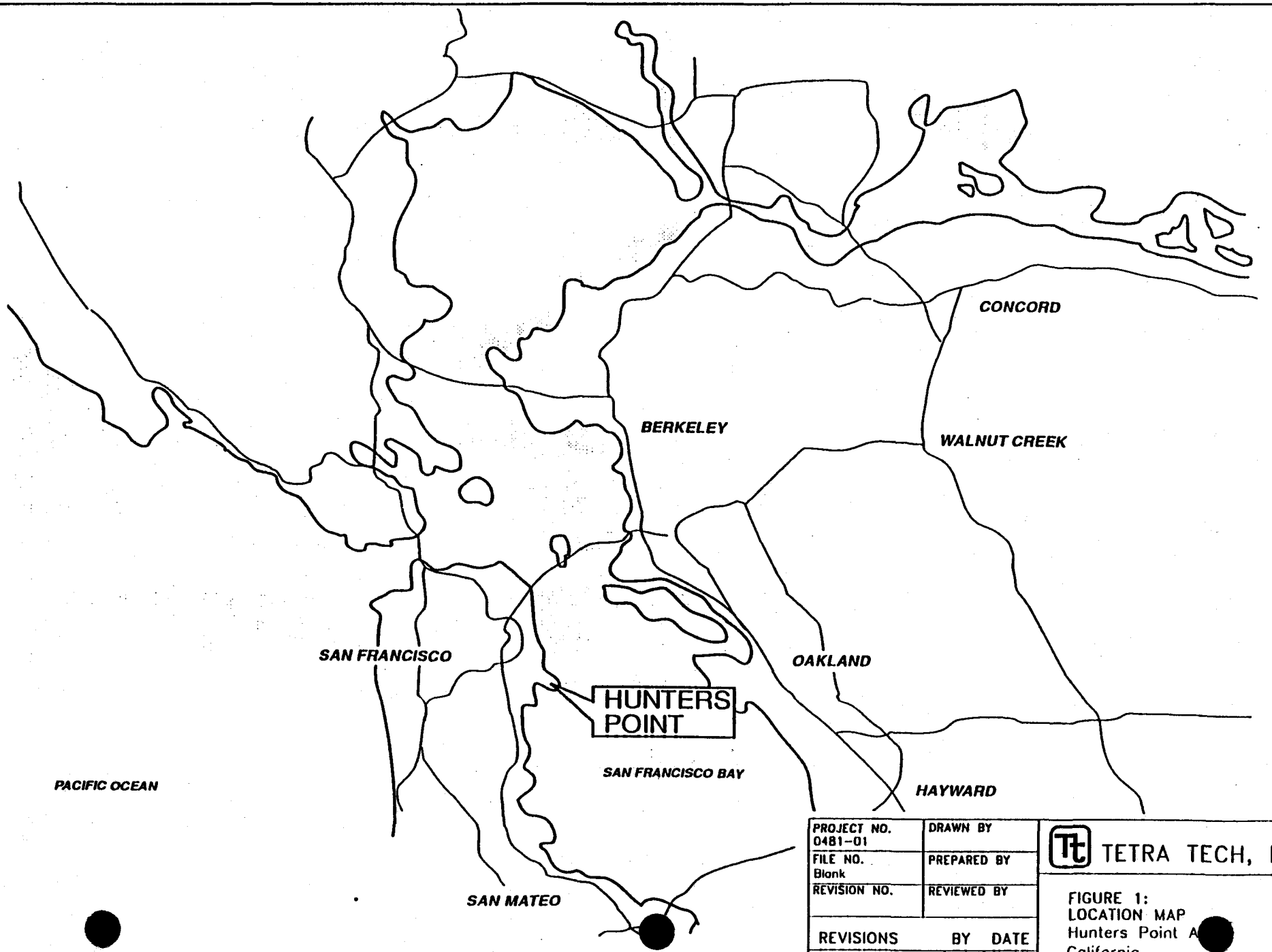
1.0 PURPOSE AND INTRODUCTION

The purpose of this document is to present the results of a lead-based paint and soil survey for eight housing units, two community areas, and the water tank at Hunters Point Naval Shipyard, Parcel A. The survey was designed according to the guidelines provided by Part II of the *Federal Register, June 29, 1992*, hereafter referred to as the Housing and Urban Development, Notice of Funding Availability Document (HUD NOFA). Because these quarters are not currently occupied and have not been occupied for several years, some of the HUD NOFA procedures are not applicable. Nevertheless, this survey was designed to follow the referenced guidelines as closely as possible, given the differing site conditions and management objectives. Because the housing units and Parcel A are not likely to be reoccupied, this survey concentrated on soil surrounding the homes and on exterior painted surfaces. The principle focus of the soil sampling at these facilities was to identify soils that exceed background concentrations of lead.

Table 1 lists the building sampled and Figure 1 depicts the locations of the buildings and areas sampled. Appendix A provides drawings of each building and gives sample locations and results. Appendix B provides photodocumentation of the lead-based paint sample locations.

2.0 LOCATION

The locations of the units to be tested are shown in Figures 1 and 2. All of the housing units were purchased by the Navy about 40 years ago, and have few, if any, similarities in design. Therefore, the units are being treated as separate, individual structures, and the results are reported separately for each of the subject properties. The eight housing units sampled are the same as those units investigated in the Field Investigation of Structures at Hunter's Point Parcel A (Tetra Tech, 1993). These buildings were chosen randomly from 35 housing units on Parcel A, and were approved by WestDiv and Treasure Island personnel prior to inspection and sampling. For common area samples, the playground at the southeastern corner of Friedel and Jerrold Avenues, and the Public Works Yard at the northern corner of Coleman and Jerrold Avenues were sampled. The community water tank was also sampled. Figure 1 illustrates the location of the area sampled. Table 1 gives the address of each unit.



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TETRA TECH, INC.

FIGURE 1:
LOCATION MAP
Hunters Point A
California

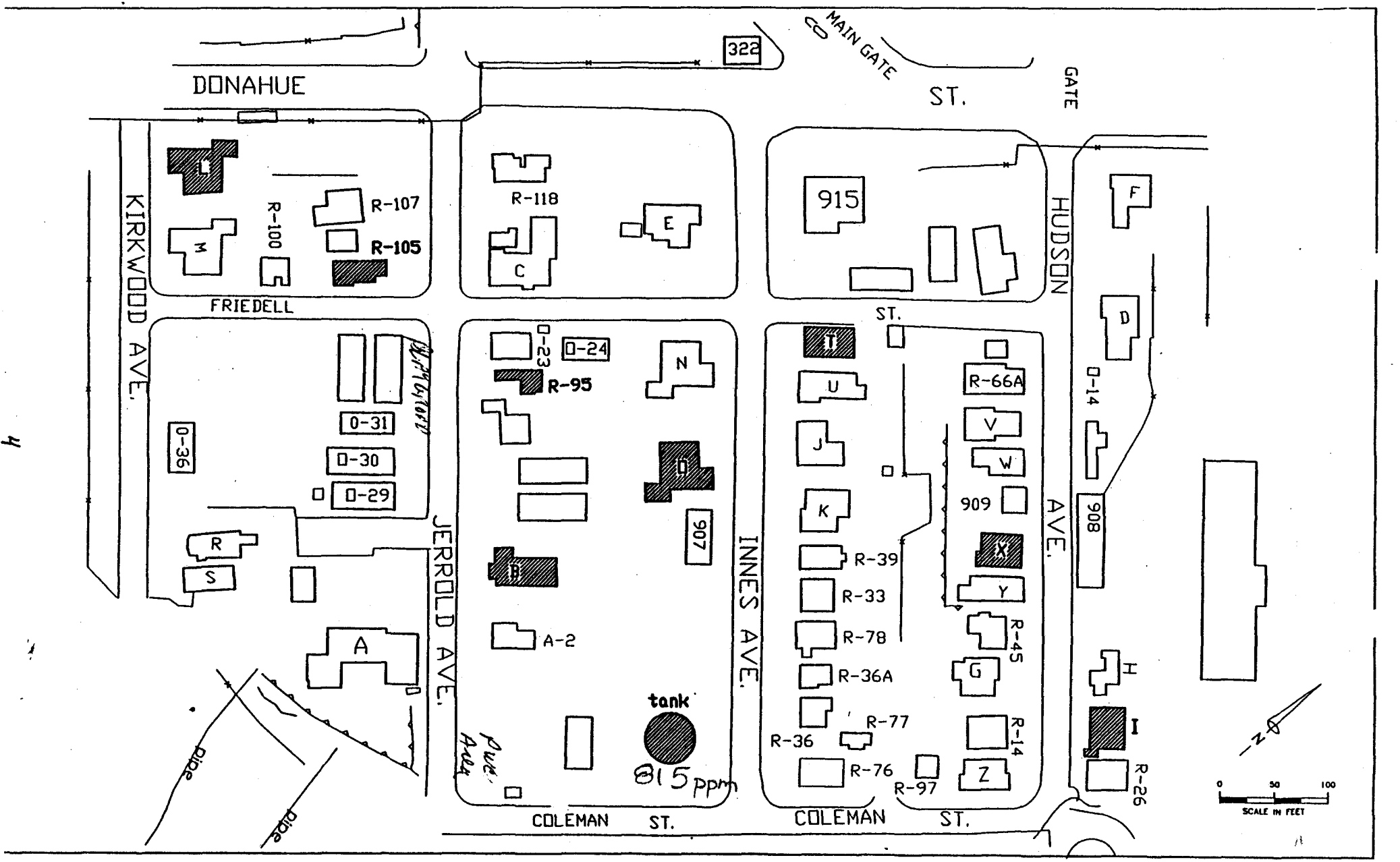


Figure 2 Quarters Area, Hunters Point

TABLE I
PROPERTIES SAMPLED AT HUNTER'S POINT: PARCEL A
JULY 21, 1993

1.	Quarters L, 522 Kirkwood Avenue.
2.	R-105, 565 Jerrold Avenue.
3.	R-95, 550 Jerrold Avenue.
4.	Quarters B, 530 Jerrold Avenue.
5.	Quarters O, 543 Innes Avenue.
6.	Quarters T, 560 Innes Avenue.
7.	Quarters X, 533 Hudson Avenue.
8.	Quarters I, 510 Hudson Avenue.
9.	Playground Common Area.
10.	Water Tank Perimeter.
11.	Public Works Yard.

3.0 SAMPLING METHODS FOR SITE SOILS

3.1 SURVEY PROCEDURES FOR THE PORTABLE SPECTRUM XRF MACHINE

Tetra Tech used a *Sci Tec* portable spectrum X-Ray Florescence Spectrophotometer (hereafter referred to as an XRF) to screen the soil samples at each location. The XRF permitted the rapid analysis of soil samples. However, the limitations of the instrument include:

- the need for repeated calibration because of the differing sample densities of the soil and the resultant scattering effects from the surrounding media;
- the need for additional time to survey because of compensation for the diffusion of photons by the soil matrix and variability in the density of the substrate; and
- less accurate results than information produced during sample analysis by atomic absorption spectrophotometry (AAS). (However, the XRF makes possible a representative survey that would be prohibitively expensive if the AAS method were used exclusively.)

3.1.1 Sampling and Measurement

The XRF is a field portable, energy-dispersive spectrometer. It is hand-held, self-contained, battery powered, and weighs 8.5 pounds. These characteristics, and the fact that it is hermetically sealed and can therefore be decontaminated, allow operation directly on-site. X-ray fluorescence is induced by a low-intensity Cd^{109}, Am^{241}, or Co^{57} gamma ray source, which is housed with a solid state detector in the sampling probe ("scanner"). Operational safety is maintained by a shutter approved by the Nuclear Regulatory Commission.

Analysis with the XRF involves placing the scanner in direct contact with the sampling medium

and opening the shutter with a key. Fluorescent X-ray photons are counted during a user-specified period of time by a counting circuit and classified into discrete energy levels by a multichannel analyzer to produce a spectrum characteristic of the elements in the sampling medium. Net intensities for each target element are calculated and converted to concentration values by means of a calibration model. This model is derived empirically by measuring the net intensities of the target elements in a set of calibration standards, and fitting a linear function that relates net intensity to concentration by a multiple regression procedure.

As is the case with all XRF systems, the relationship between net intensity and concentration varies with the characteristics of the sample matrix. In the case of solid, inhomogeneous particulate media, such as soils or sludges, the concentration-intensity relationship is particularly influenced by variability in the grain size distribution, bulk density, and the geometric relationships between discrete grains containing the target element(s) and the detector. Net intensities can be enhanced or absorbed by certain non-target elements that may be present. Because data quality can be significantly influenced by any or all of these, matrix effects must be taken into account in the calibration procedure.

3.2 PROCEDURE FOR SOIL SAMPLING

To confirm the highest XRF concentration at a site, a soil sample was collected for lab analysis using Atomic Absorption Spectrophotometry (EPA Method 7420) for each home or property location. Procedures are outlines below.

a. the selected sampling site reflected the highest lead concentration by XRF.

b. a clean trowel was used to collect about ten grams of surface soil (not greater than one inch deep) from the selected site. Soil samples did not include growing vegetation.

c. a clean pair of disposable latex gloves was worn by personnel to prevent cross contamination.

d. organic matter or a surface mat of decayed grass or leaves was not discarded lead is

usually adsorbed more strongly on organic matter than inorganic soil. Samples of soil were taken from the surface, no more than one inch deep because lead sourced from lead-based paint is deposited on the surface of the soil and is persistent. Also, surface soils are those most likely to be disturbed by future owners and occupants of the properties.

e. the soil sample was placed in a clean "Whirl-Pack" plastic bag, which was sealed securely.

f. the bag was labeled with the location of the sample, and the date the sample was taken.

g. the sampling trowel was decontaminated between each sample.

In cases where there was evidence to suggest uniformly high concentrations of lead in soil and the objective was to evaluate the typical lead exposure in the area surrounding the property, a "representative" composite sample was obtained from four samples taken from the front, side, and rear of the site. This procedure was used for the water tank. Table 2 presents the sample results of soils by EPA Method 7420 and by XRF. Soil samples analyzed by EPA Method 7420 were generally duplicates taken for quality assurance purposes.

TABLE 2

SOIL SAMPLE RESULTS

Building Number	Sample Number	XRF Result ppm	Sample Number	EPA Method 7420 Duplicate (ppm)
Quarters L	LX-002	230	N/A	Not Taken
	LX-003	248	N/A	Not Taken
	LX-004	213	N/A	Not Taken
	LX-005	256	LS-002	150
	N/A	Not Taken	LS-001	150
R-103	PX-002	154	N/A	None Taken
	PX-003	190	PS-001	2700
	PX-005	165	N/A	None Taken
Playground	PGX-001	170	PGS-001	110
R-95	RX-001	160	RS-001	200
	RX-002	160	N/A	Not Taken
	RX-003	150	N/A	Not Taken

Quarters B	BX-001 BX-004	179 197	N/A BS-001	Not Taken 240
Public Works Yard	PWX-001	167	PWS-001	250
Quarters O	OX-002 OX-003	208 158	05-001 N/A	92 Not Taken
Quarters T	TX-002 TX-003	182 152	TS-001 N/A	210 Not Taken
Quarters I	IX-002 IX-003	157 159	N/A TS-001	Not Taken 120
Quarters X	XX-002 XX-003	193 223	N/A XS-001	Not Taken 53
Water Tank	N/A	Not Taken	Composite Soil Sample	815

3.3 DISCUSSION OF RESULTS

Soil analyzed by XRF had a lead concentration range of 154 to 250 ppm, with an average concentration of 185 ppm and a standard deviation of 32. Confirmation soil samples analyzed by Atomic Absorption had a range of 53 to 2700, with an average concentration of 388 and a standard deviation of 789. However, with the elimination of Sample # PS-001, which appears to be erroneous (2700 ppm), the average concentration is reduced to 157.5 with a standard deviation of 66.

This general range of lead in soil is within generally acceptable levels; however, the highest level of lead found (815 ppm at the water tank) is substantially above the generally acceptable level of lead in soil. The U.S. EPA and Cal EPA have not set standards for lead in soil. When disposing of soil in California, 1,000 ppm lead is considered hazardous waste according to California Code of Regulations, Title 27, §66699. Clean-up levels for lead are generally set below 500 ppm; actual clean-up levels are determined by health based risk assessments.

4.0 SAMPLING METHODS FOR PAINTED SURFACE

Ideally, all painted surfaces inside and outside a home should be tested for lead to determine whether or not lead paint hazards exist and where they are located. However, because reoccupancy at the subject properties is not likely, the focus of this investigation was to determine the lead content of the surfaces that are most likely to flake or peel during demolition or remodeling work. Because many of these properties have not been occupied or maintained for some time, each of these eight units had several painted surfaces likely to peel or flake during demolition. These surfaces were sampled according to the following procedures:

- Samples of about one square centimeter or more of the paint were collected and placed in a ziplock bag.
- A sample label, indicating paint condition, paint color, multiple layers, sample number, sample time/date, and sampler, was filled out and placed in the bag.
- The sample location was identified on a simple diagram of the house.
- A photograph of the sample location was taken.

Table 3 present key information for paint samples taken at each of the buildings and percent lead content as measured by EPA Method 7420.

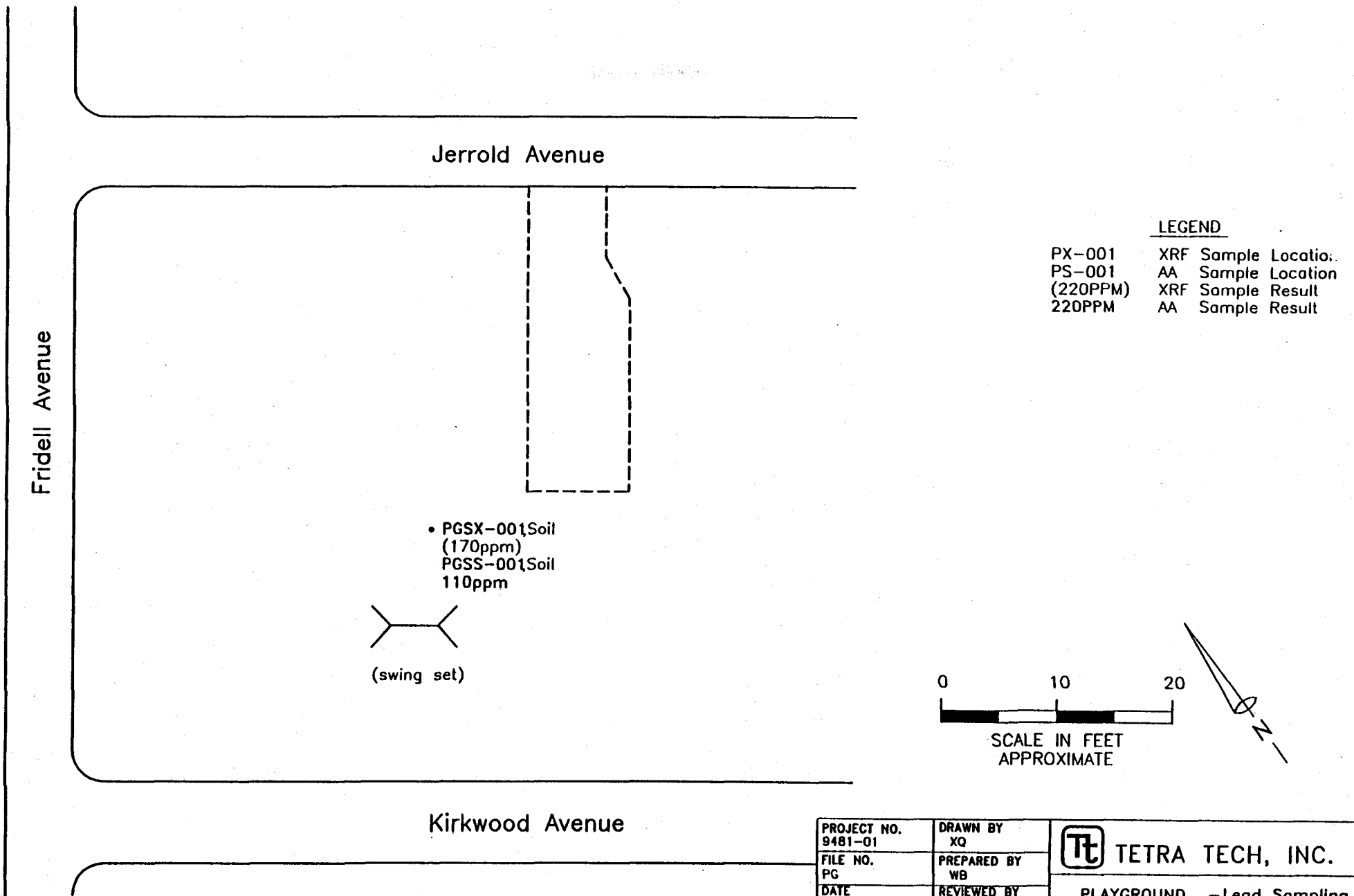
TABLE 3
PAINT SAMPLE RESULTS

Building	Sample Number	Layers	Color	Condition	Dust	Result
L	L-1	2	Yellow, White	Chipped	Yes	11%
	L-2	2	White, Sky blue	Chipped	Yes	.24%
	L-3	2	Beige, White	Chipped	Yes	.25%
R-105	1	2	Blue, White	Fair	Yes	19%
	2	1	Beige	Good	Yes	.47%
	3	3	Yellow, Green, Blue	Good	Yes	.38%
	4	1	Dark Beige	Fair	Yes	1.8%
	5	1	White	Good	Yes	.13%
R-95	1	>1	White	Poor	Yes	2.1%
	2	2	Yellow, Brown	Poor	Yes	26%
	3	2	Grey, Yellow	Poor	Yes	.36%
	4	>1	Beige	Variable	Yes	.15%
B	1	2	White, Beige	Poor	Yes	.27%
	2	1	Yellow	Poor	Yes	.38%
	3	1	Beige	Poor	Yes	8%
	4	1	Grey	Poor	Yes	.23%
O	1	3	White, Beige, White	Poor	Yes	3.1%
	2	4	White, Red, Green, Beige	Poor	Yes	.37%
	3	4	Blue, Green, Pink, Beige	Poor	Yes	.16%
	4	4	Beige, Yellow, Green, Blue	Poor	Yes	.30%
	5	1	Yellow	Good	Yes	4.5%

T	1	1	White	Good	No	1.2%
	2	2	White/Beige	Good	No	10%
	3	2+	White	Chipped	No	25%
	4	2	White	Chipped	No	.21%
	5	2	Beige	Good	No	.31%
X	1	2	Brown	Chipped	Yes	15%
	2	2	White, Blue	Chipped	Minor	.11%
	3	2	White, Green	Chipped	Minor	ND
	4	1	Blue	Chipped	Yes	.76%
	5	1	Tan	Peeling	No	.37%
	6	2+	Yellow, Green	Chipped	Yes	.47%
I	1	2+	White, Green	Chipped	Yes	.62%
	2	2+	White, Green	Chipped	Yes	.38%
	3	1	Pink	Chipped	Yes	.26%

APPENDIX A

Building Drawings



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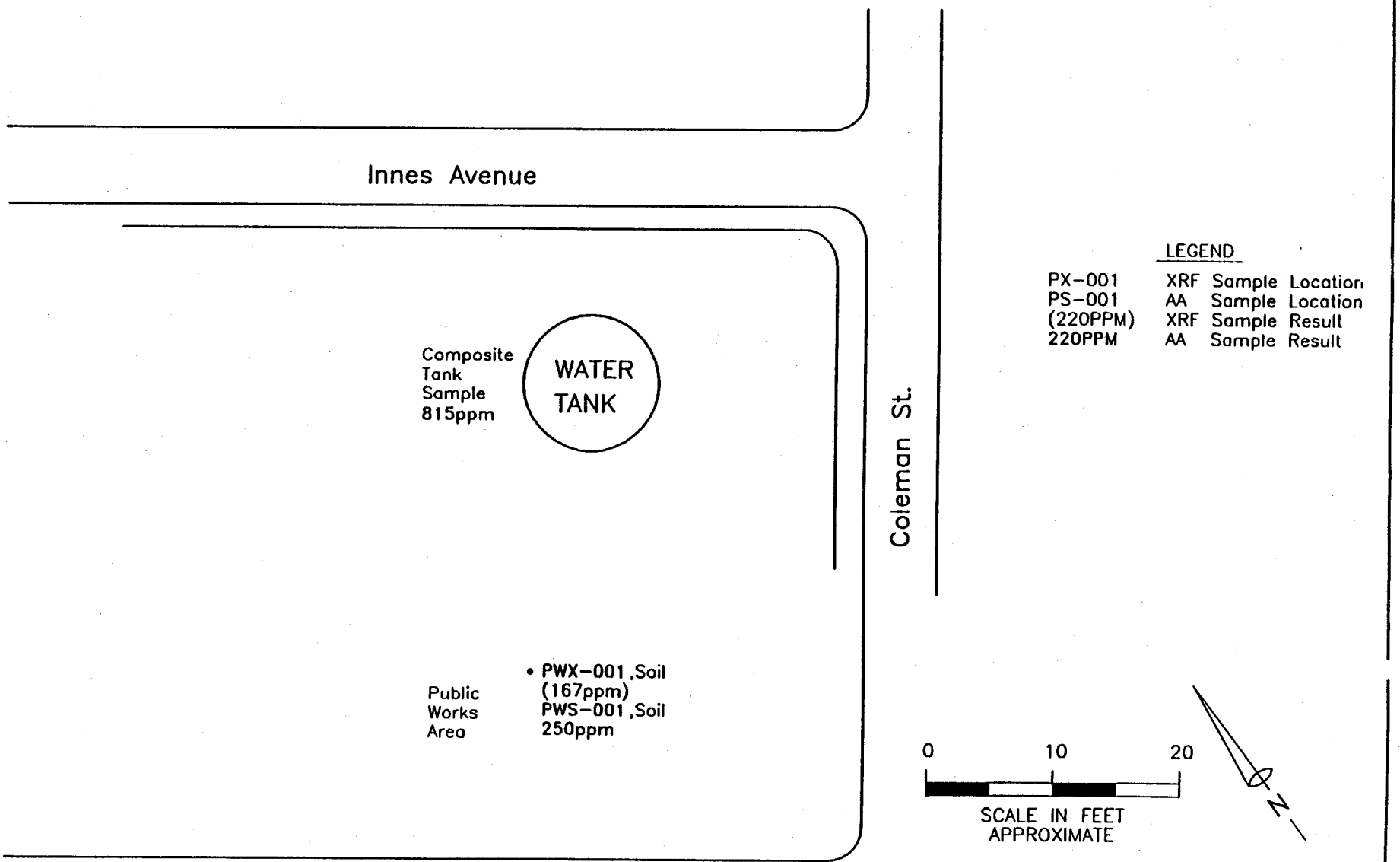
DATE 08/17/93	REVIEWED BY RV

REVISIONS	BY	DATE

TETRA TECH, INC.

PLAYGROUND -Lead Sampling Locations and Results
Hunters Point
California



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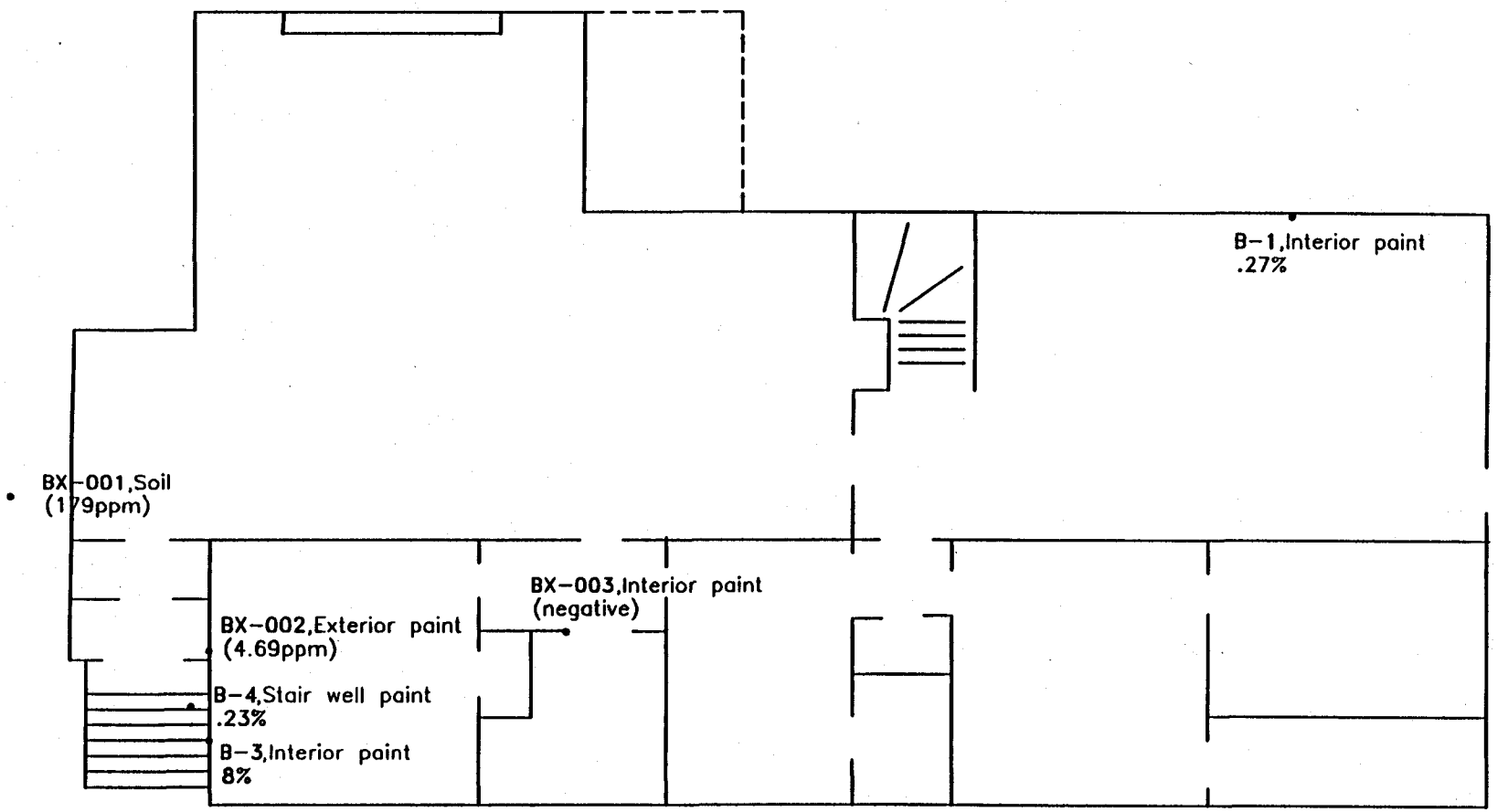
DATE 08/01/93	REVIEWED BY RV/EL/WB

REVISIONS	BY	DATE

TETRA TECH, INC.

TANK - Lead Sampling Locations and Results
Hunters Point
California

TANK



BX-004,Soil
(197ppm)
BS-001,Soil
240ppm

BUILDING B
FIRST FLOOR

0 10 20
SCALE IN FEET
APPROXIMATE

N

LEGEND

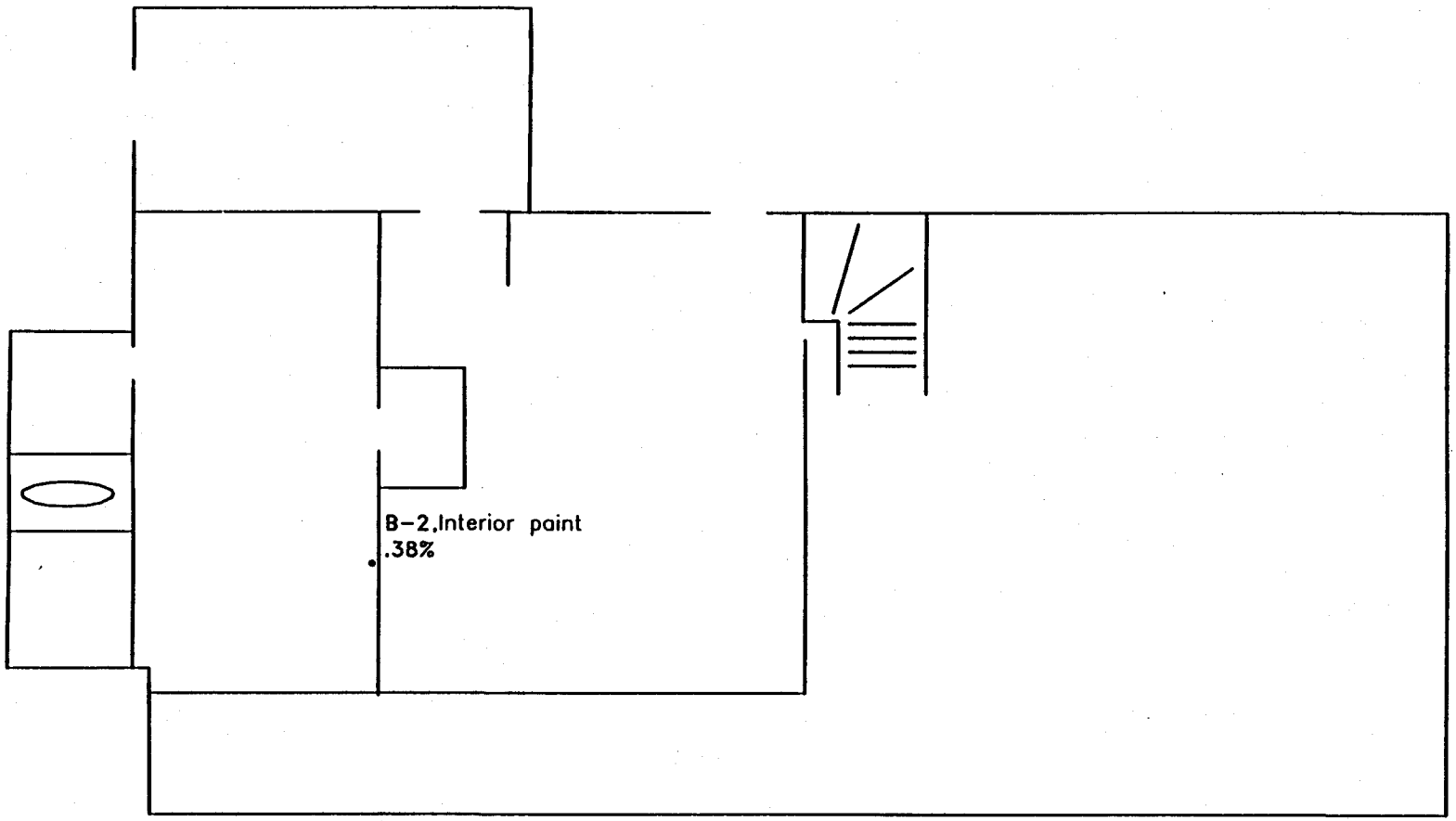
PX-001	XRF	Sample Location
PS-001	AA	Sample Location
(220PPM)	XRF	Sample Result
220PPM	AA	Sample Result

PROJECT NO. 9481-01	DRAWN BY XQ
FILE NO. BL-B	PREPARED BY WB
DATE 08/04/93	REVIEWED BY RV

REVISIONS	BY	DATE

TETRA TECH, INC.

BUILDING B – Lead Sampling Locations and Results
Hunters Point
California



0 10 20

SCALE IN FEET
APPROXIMATE

N

BUILDING B
BASEMENT

LEGEND

PX-001	XRF Sample Location
PS-001	AA Sample Location
(220PPM)	XRF Sample Result
220PPM	AA Sample Result

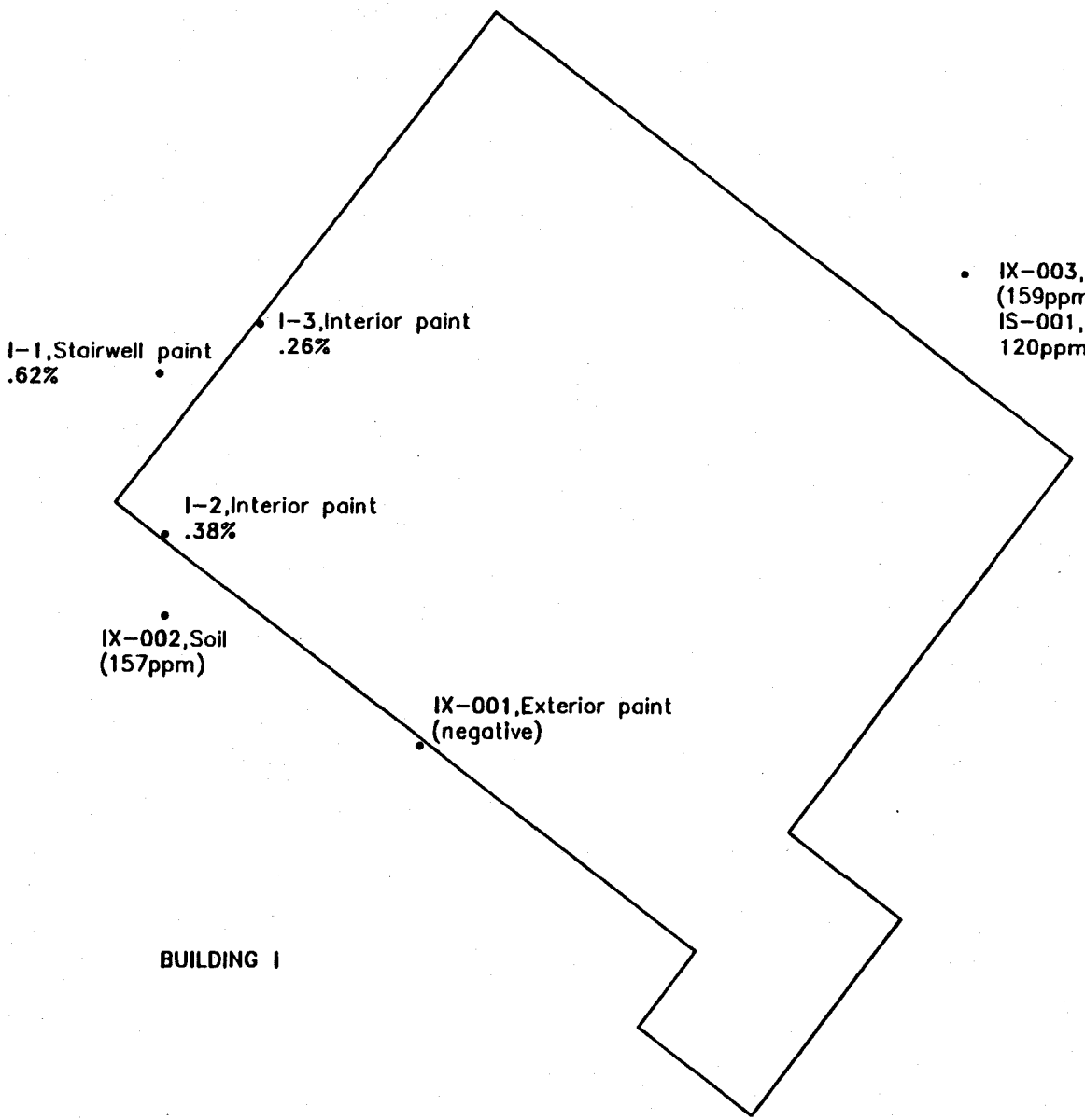
PROJECT NO. 9481-01	DRAWN BY XQ
FILE NO. BL-BB	PREPARED BY WB
DATE 08/04/93	REVIEWED BY RV

REVISIONS	BY	DATE

TETRA TECH, INC.

BUILDING B – Lead Sampling Locations and Results
Hunters Point
California

SHEET 2 OF 2



LEGEND

PX-001	XRF Sample Location
PS-001	AA Sample Location
(220PPM)	XRF Sample Result
220PPM	AA Sample Result

0 10 20

SCALE IN FEET
APPROXIMATE

N

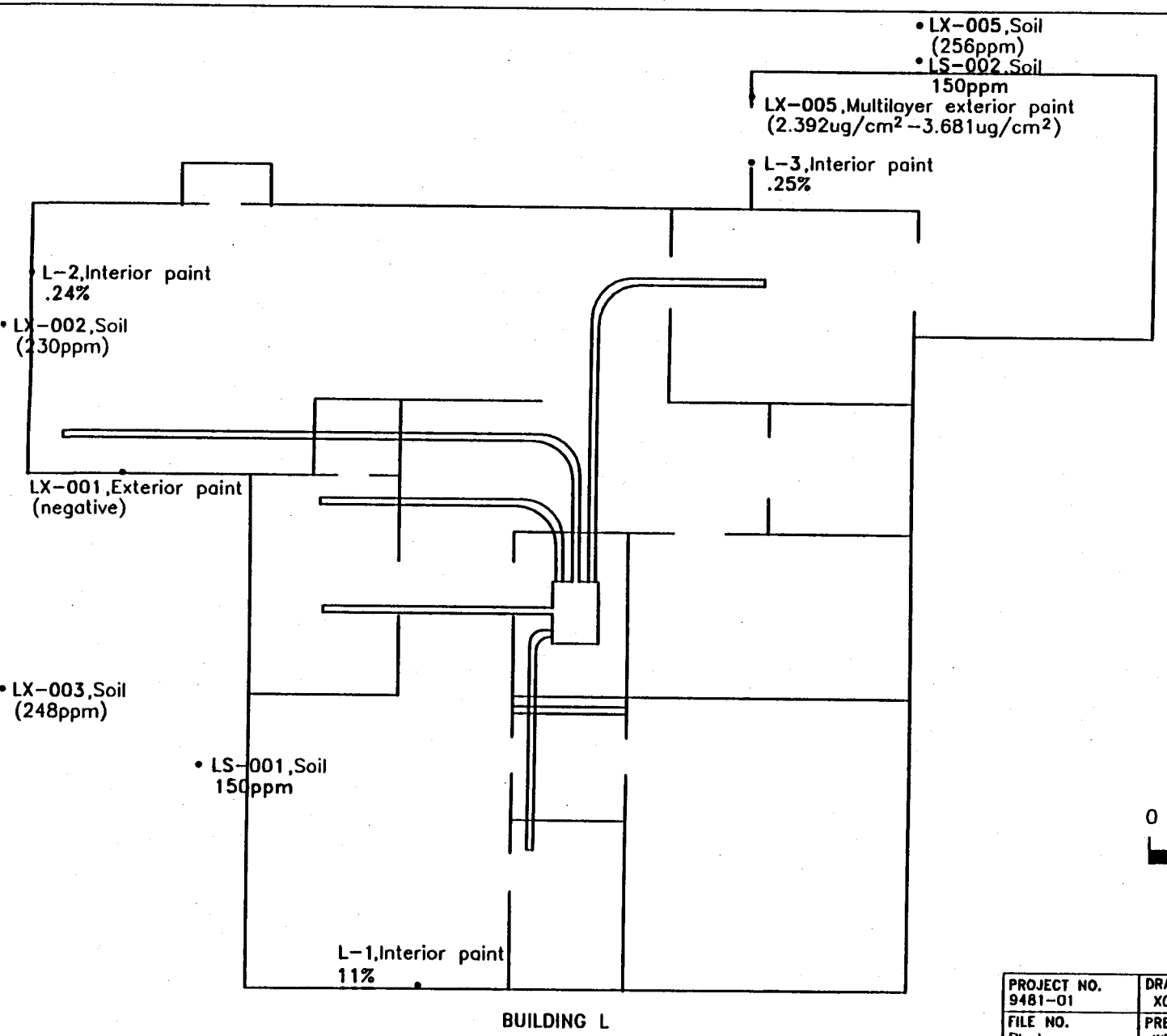
PROJECT NO. 9481-01	DRAWN BY XQ
FILE NO. BL-12	PREPARED BY WB
REVISION NO. 08/17/93	REVIEWED BY RV

REVISIONS	BY	DATE

TETRA TECH, INC.

BUILDING 1 – Lead Sampling Locations and Results

Hunters Point
California



LEGEND

PX-001	XRF Sample Location
PS-001	AA Sample Location
(220PPM)	XRF Sample Result
220PPM	AA Sample Result

• LX-004,Soil
(213ppm)

0 10 20

SCALE IN FEET
APPROXIMATE

N

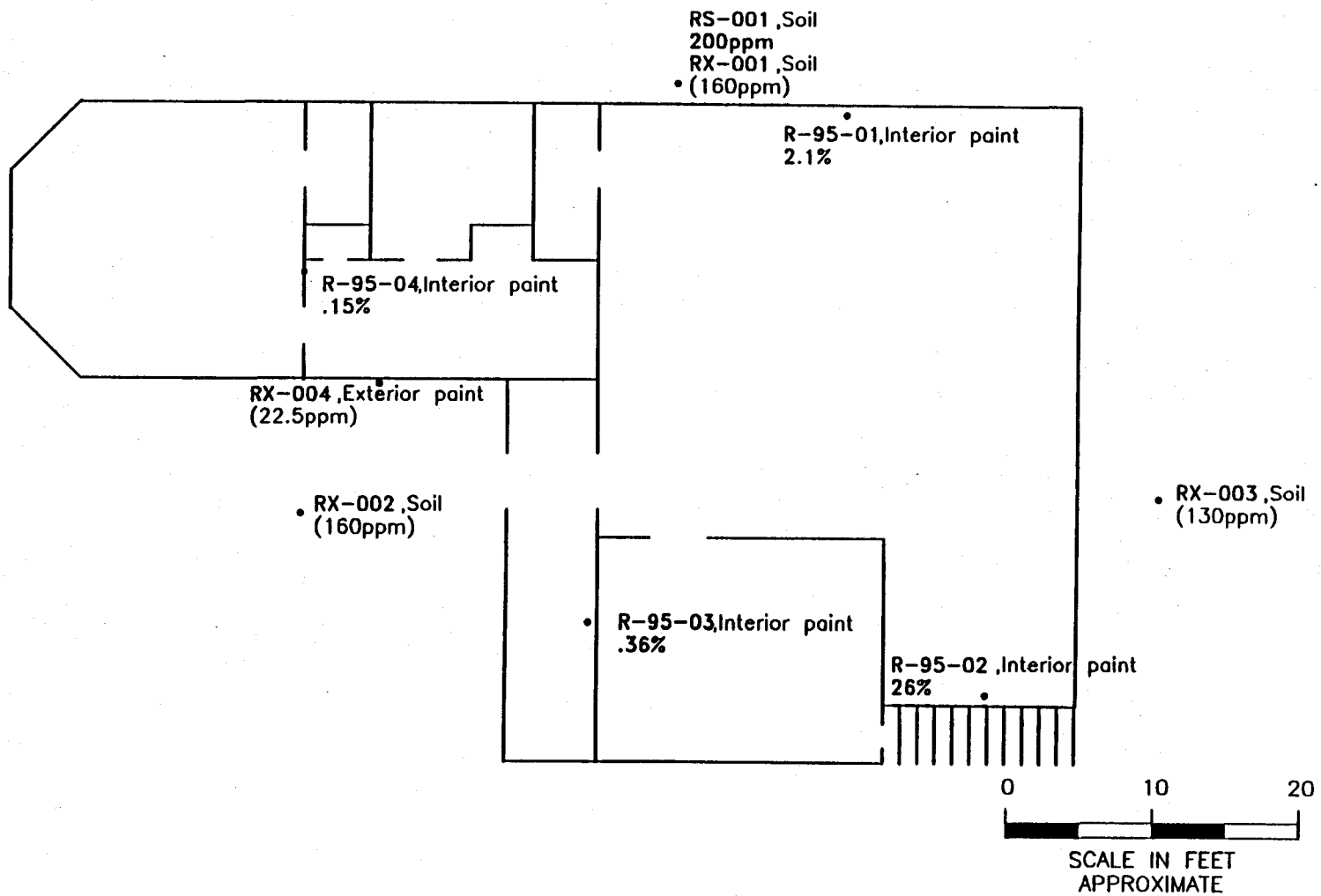
PROJECT NO. 9481-01	DRAWN BY XQ
FILE NO. BL-L	PREPARED BY WB
DATE 08/03/93	REVIEWED BY RV

REVISIONS	BY	DATE

TETRA TECH, INC.

BUILDING L - Lead Sampling Locations and Results
Hunters Point
California

SHEET 1 OF 1



BUILDING R-95

LEGEND

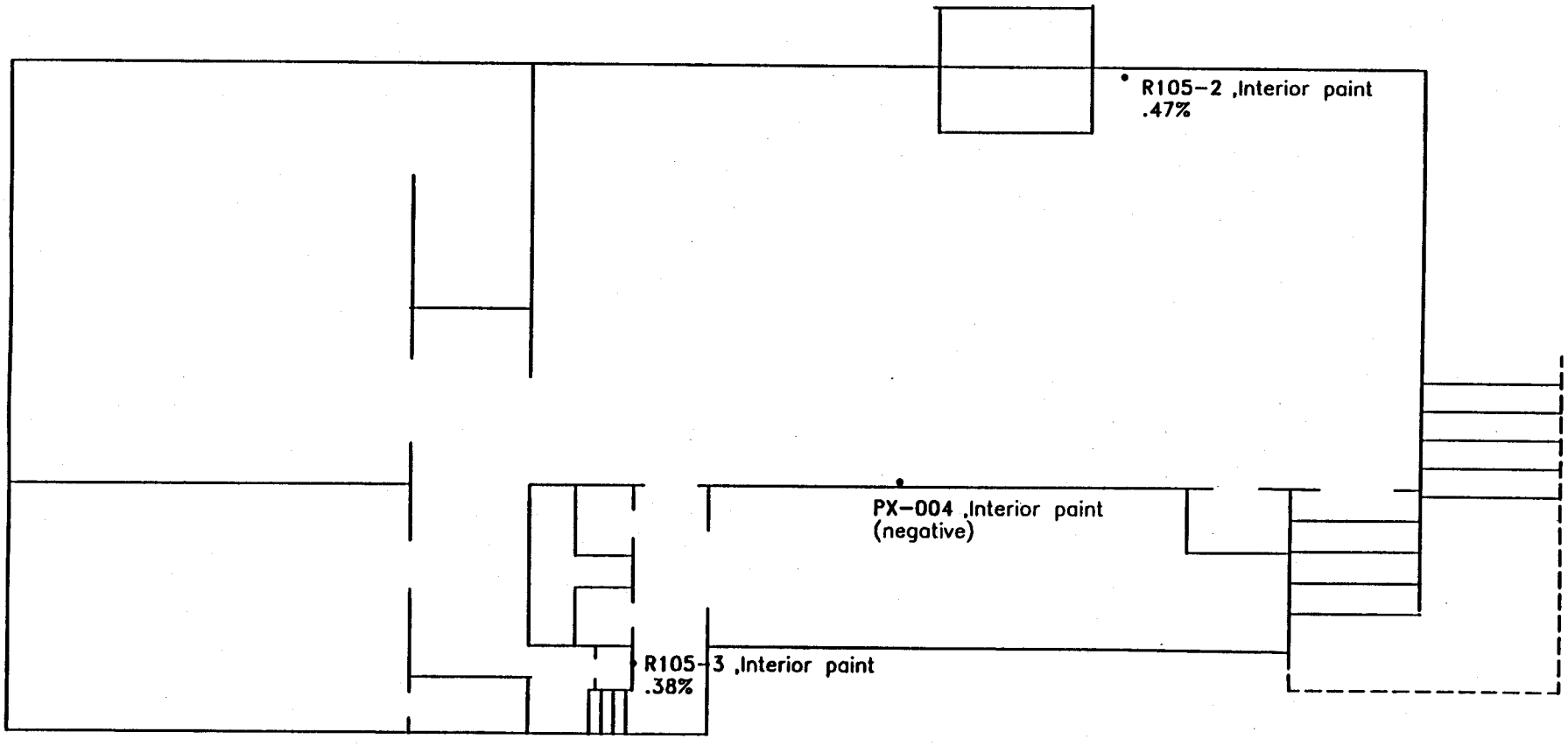
PX-001	XRF	Sample Location
PS-001	AA	Sample Location
(220PPM)	XRF	Sample Result
220PPM	AA	Sample Result

PROJECT NO. 9481-01	DRAWN BY XQ
FILE NO. BL-R-95	PREPARED BY WB
DATE 08/04/93	REVIEWED BY RV

REVISIONS	BY	DATE

TETRA TECH, INC.

BUILDING R-95 – Lead Sampling Locations and Results
Hunters Point
California



0 10 20

SCALE IN FEET
APPROXIMATE

N

BUILDING R-105
UPPER LEVEL

LEGEND

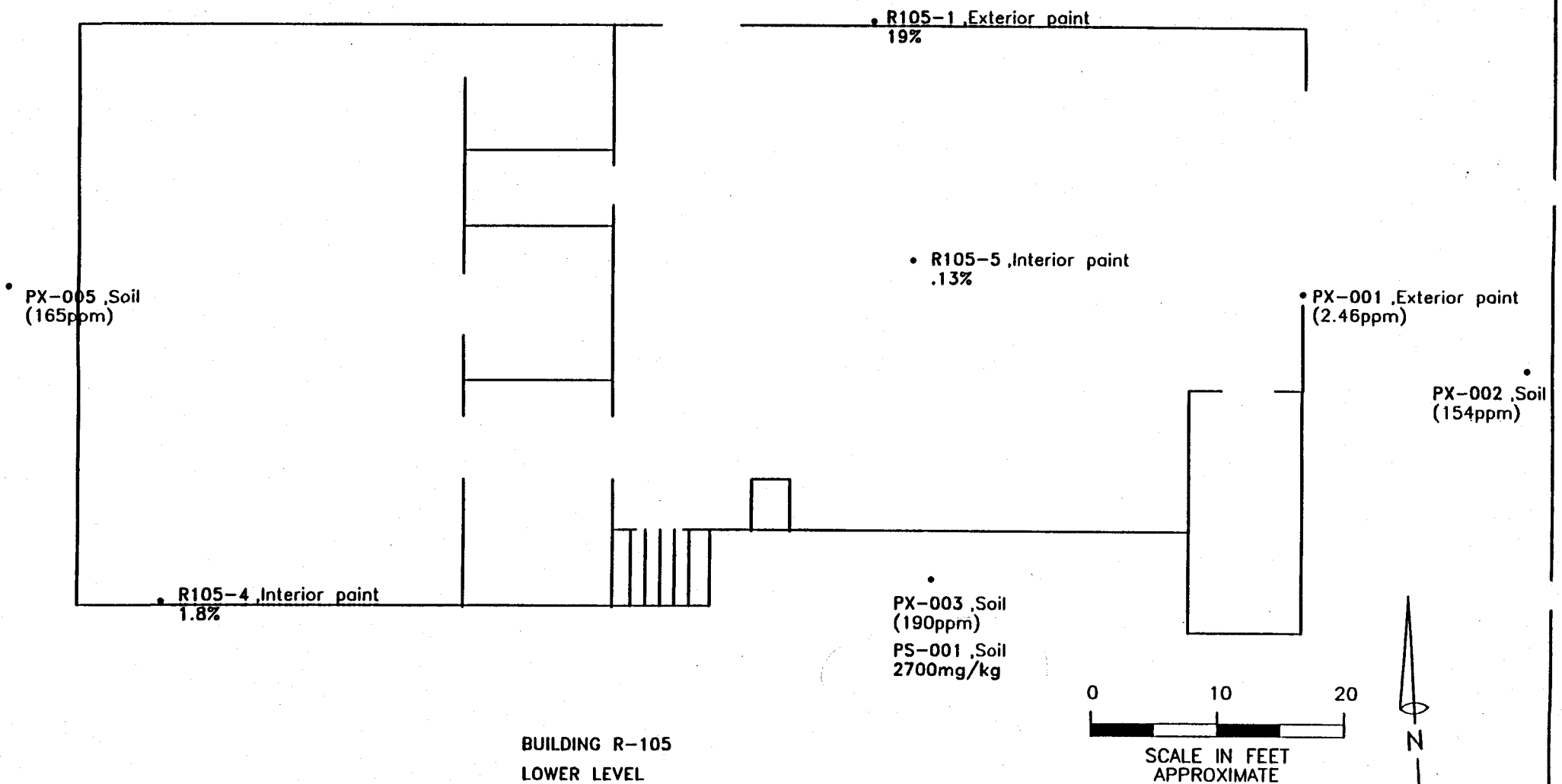
PX-001	XRF Sample Location
PS-001	AA Sample Location
(0PPM)	XRF Sample Result
220PPM	AA Sample Result

PROJECT NO. 9481-01	DRAWN BY XQ
FILE NO. BL-R-105	PREPARED BY WB
DATE 08/04/93	REVIEWED BY RV

REVISIONS	BY	DATE

TETRA TECH, INC.

BUILDING R-105 - Lead Sampling Locations and Results
Hunters Point
California



BUILDING R-105
LOWER LEVEL

LEGEND

PX-001	XRF	Sample Location
PS-001	AA	Sample Location
(220PPM)	XRF	Sample Result
220PPM	AA	Sample Result

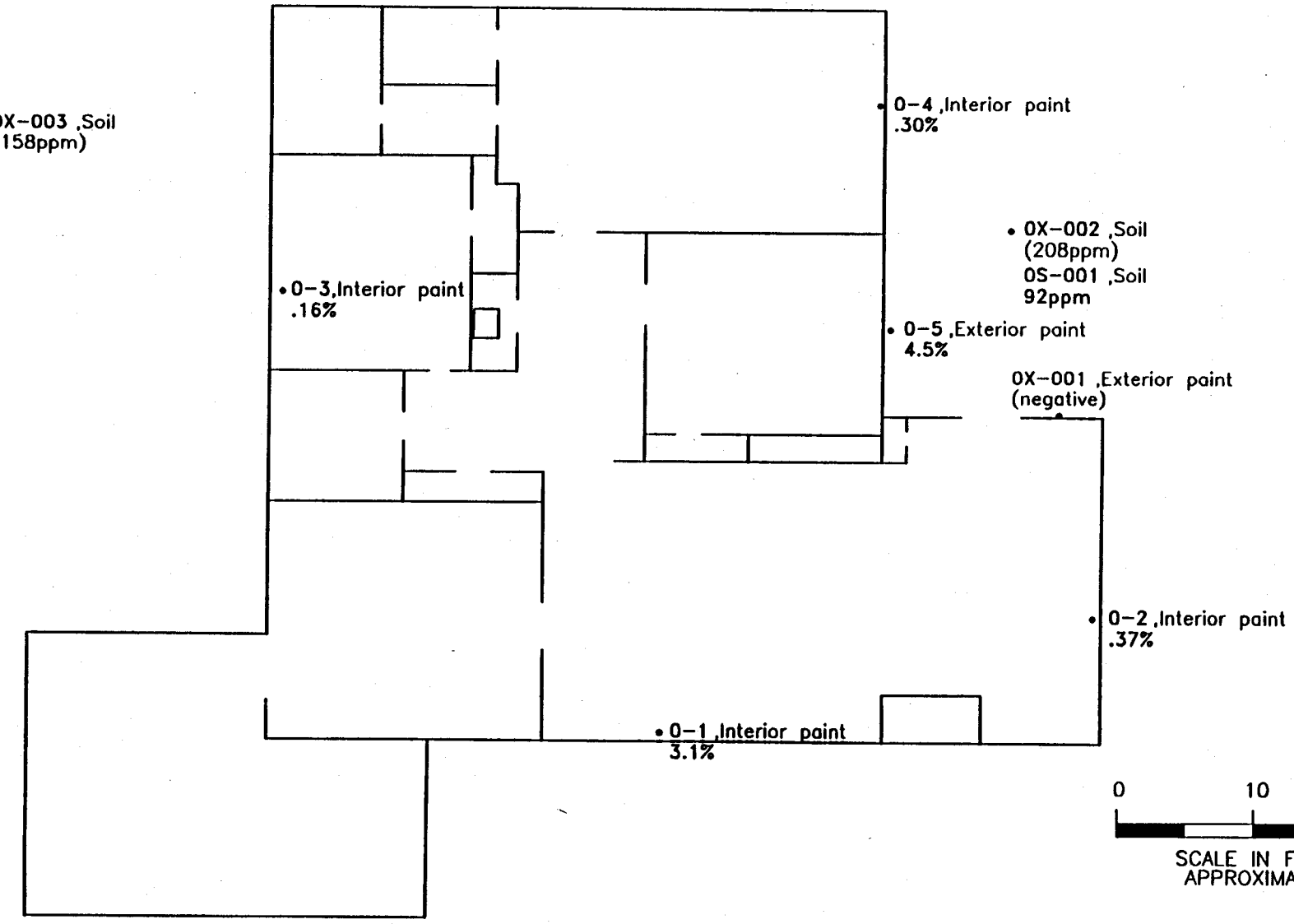
PROJECT NO. 9481-01	DRAWN BY XQ
FILE NO. BL-R105B	PREPARED BY WB
DATE 08/04/93	REVIEWED BY RV

REVISIONS	BY	DATE

TETRA TECH, INC.

BUILDING R-105 – Lead Sampling Locations and Results
Hunters Point
California

SHEET 2 OF 2



0 10 20

SCALE IN FEET
APPROXIMATE

N

BUILDING 0

LEGEND

PX-001	XRF	Sample Location
PS-001	AA	Sample Location
(220PPM)	XRF	Sample Result
220PPM	AA	Sample Result

PROJECT NO. 9481-01	DRAWN BY XQ
FILE NO. BL-0	PREPARED BY WB
DATE 08/04/93	REVIEWED BY RV

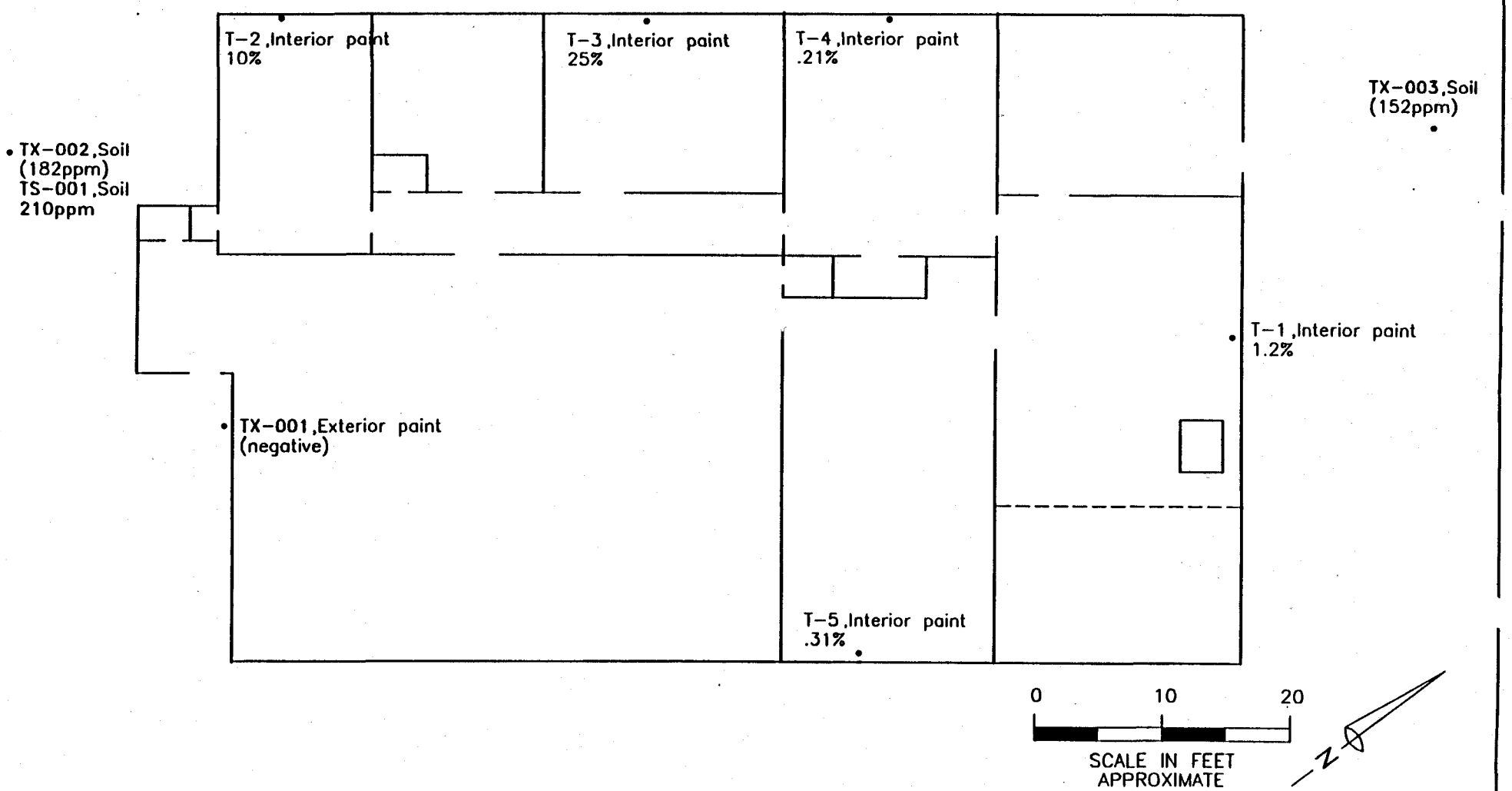
REVISIONS	BY	DATE

TETRA TECH, INC.

BUILDING 0 – Lead Sampling Locations and Results

Hunters Point
California

SHEET 1 OF 2



BUILDING T

LEGEND

PX-001	XRF	Sample Location
PS-001	AA	Sample Location
(220PPM)	XRF	Sample Result
220PPM	AA	Sample Result

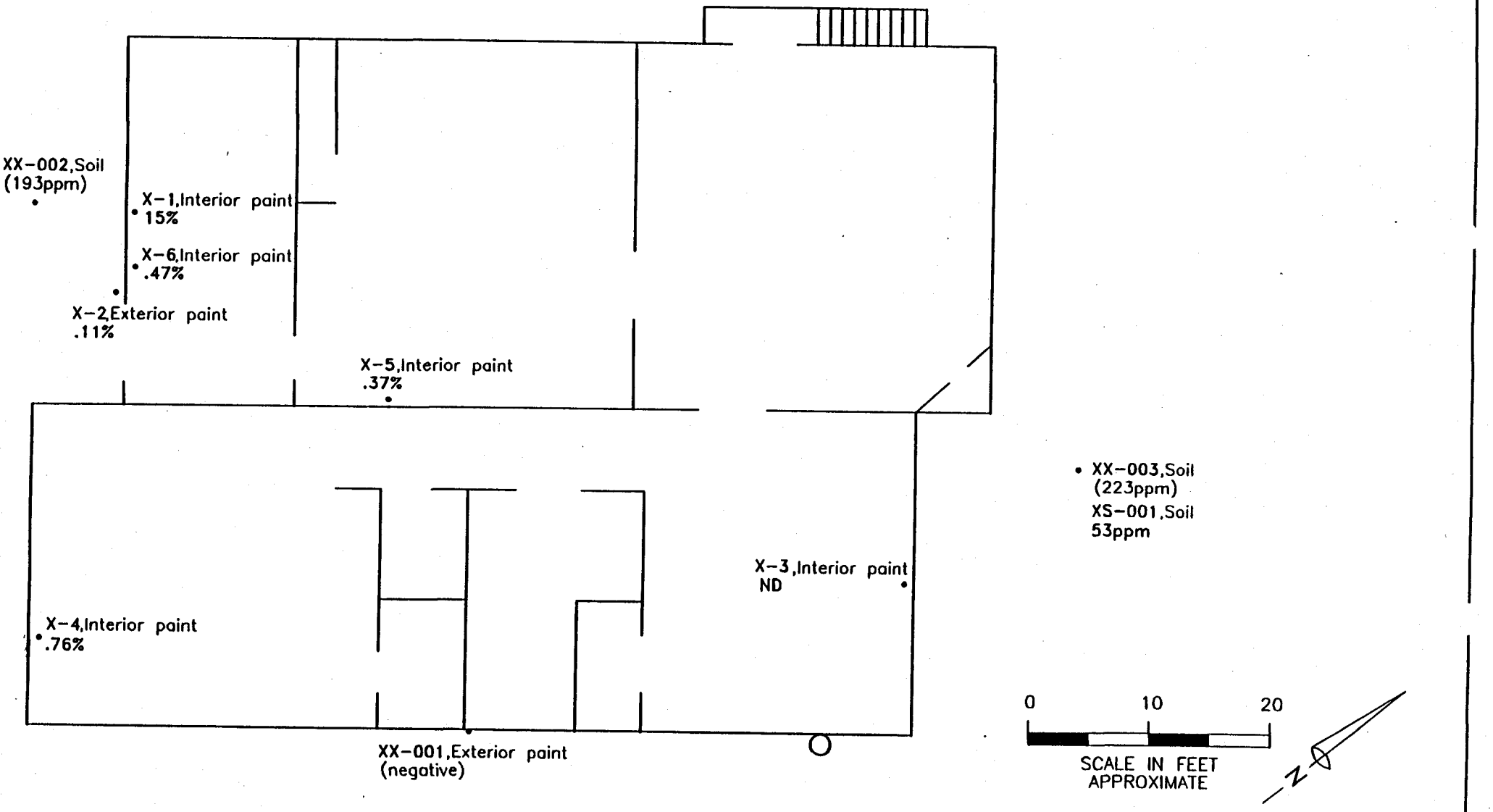
PROJECT NO. 9481-01	DRAWN BY XQ
FILE NO. BL-T	PREPARED BY WB
DATE 08/04/93	REVIEWED BY RV

REVISIONS	BY	DATE

TETRA TECH, INC.

BUILDING T - Lead Sampling Locations and Results

Hunters Point
California



BUILDING X

LEGEND

PX-001	XRF Sample Location
PS-001	AA Sample Location
(220PPM)	XRF Sample Result
220PPM	AA Sample Result

PROJECT NO. 9481-01	DRAWN BY XQ
FILE NO. BL-X	PREPARED BY WB
DATE 08/03/93	REVIEWED BY RV

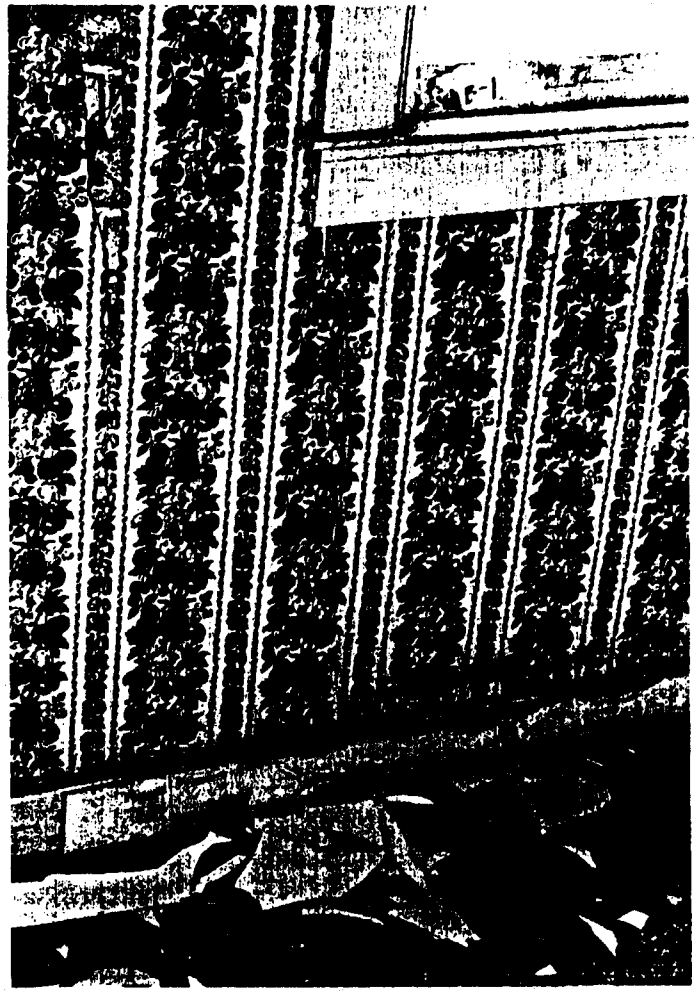
REVISIONS	BY	DATE

TETRA TECH, INC.

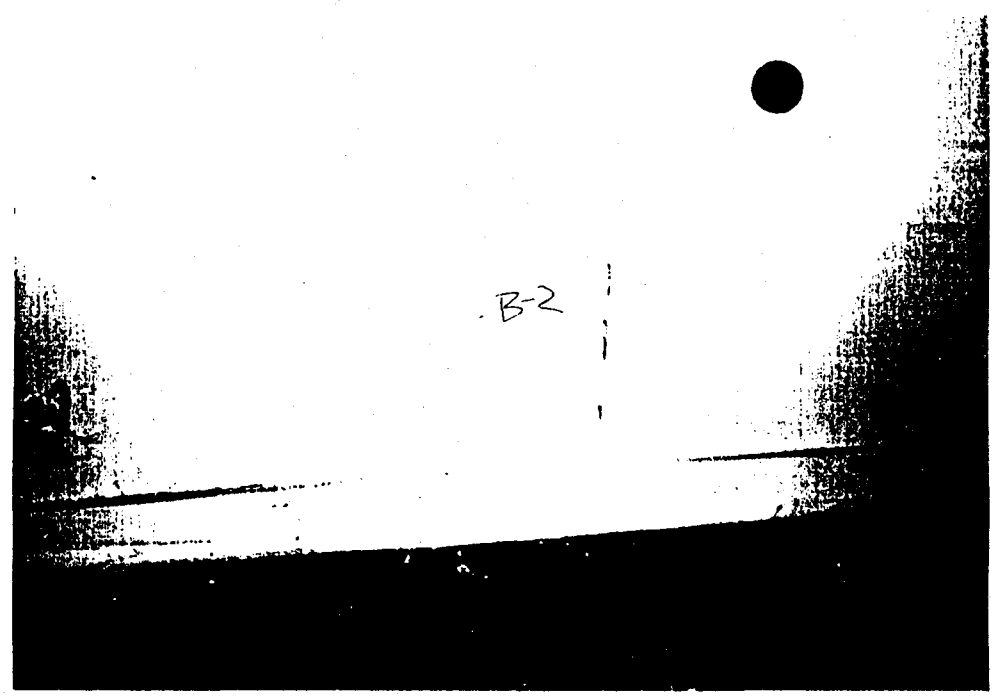
BUILDING X - Lead Sampling Locations and Results
Hunters Point
California

APPENDIX B

Photodocumentation

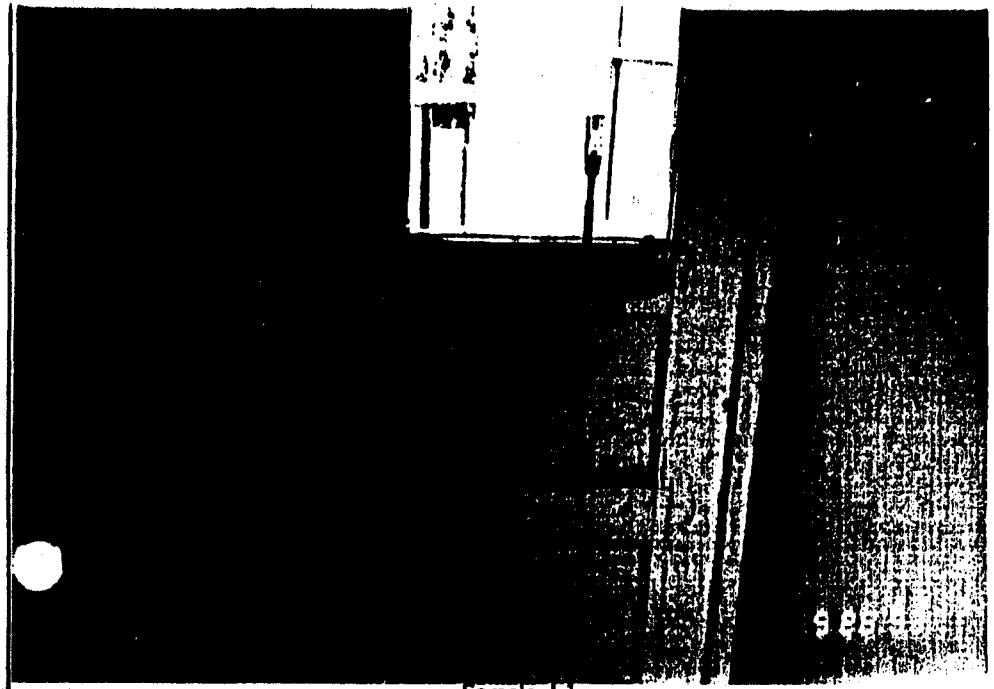


Sample B-1



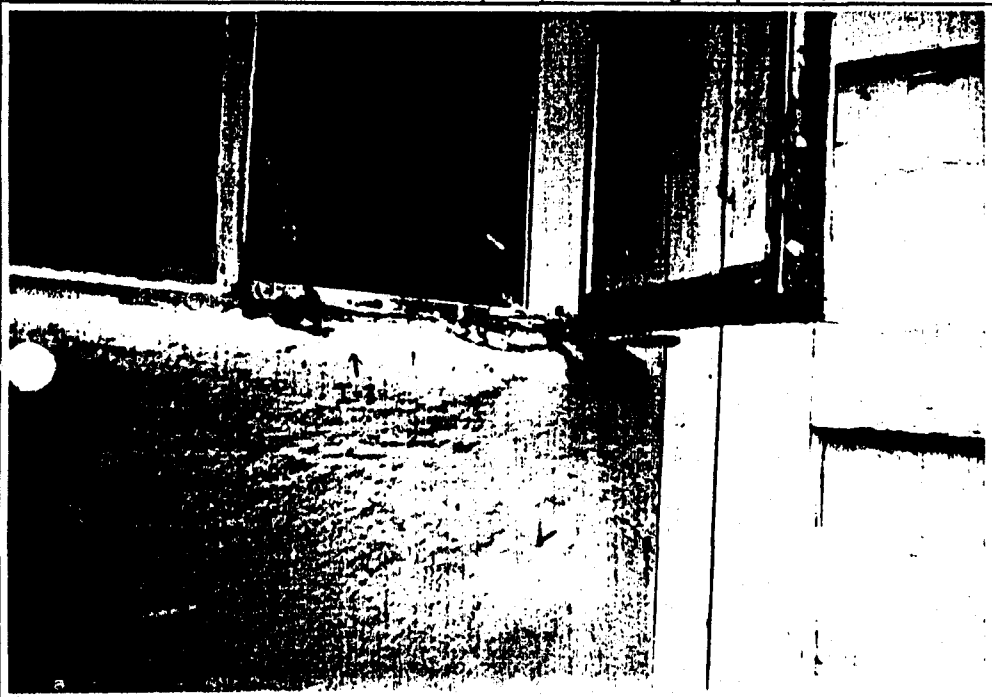
Sample B-2

Sample B-3 & B-4

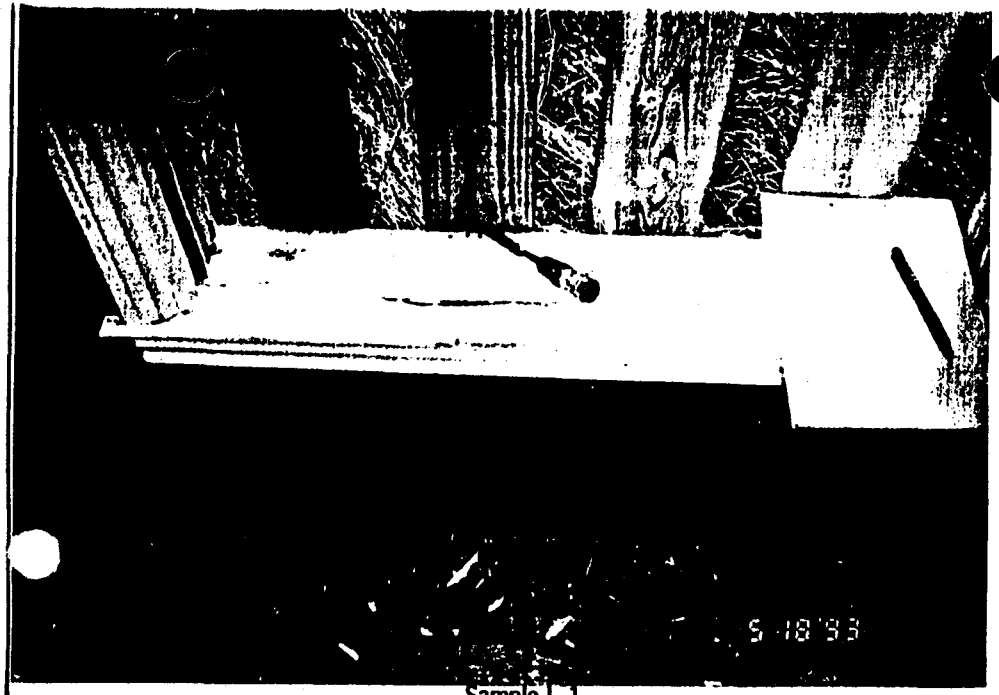


Sample I-1
Interior of door on side porch; white over green paint

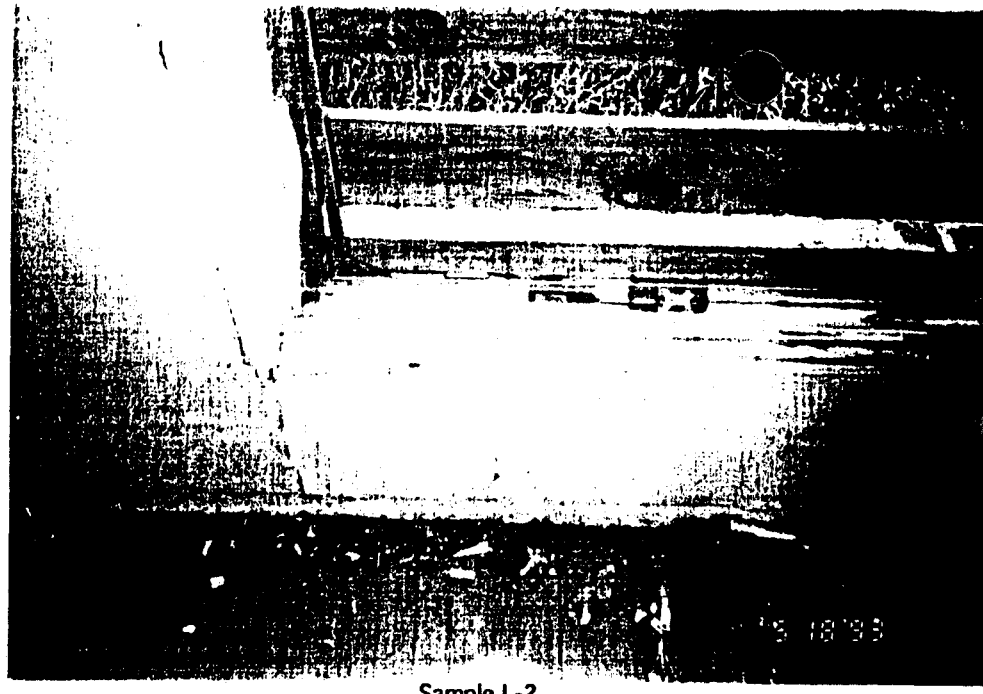
Sample I-2
Northwest window sill in kitchen



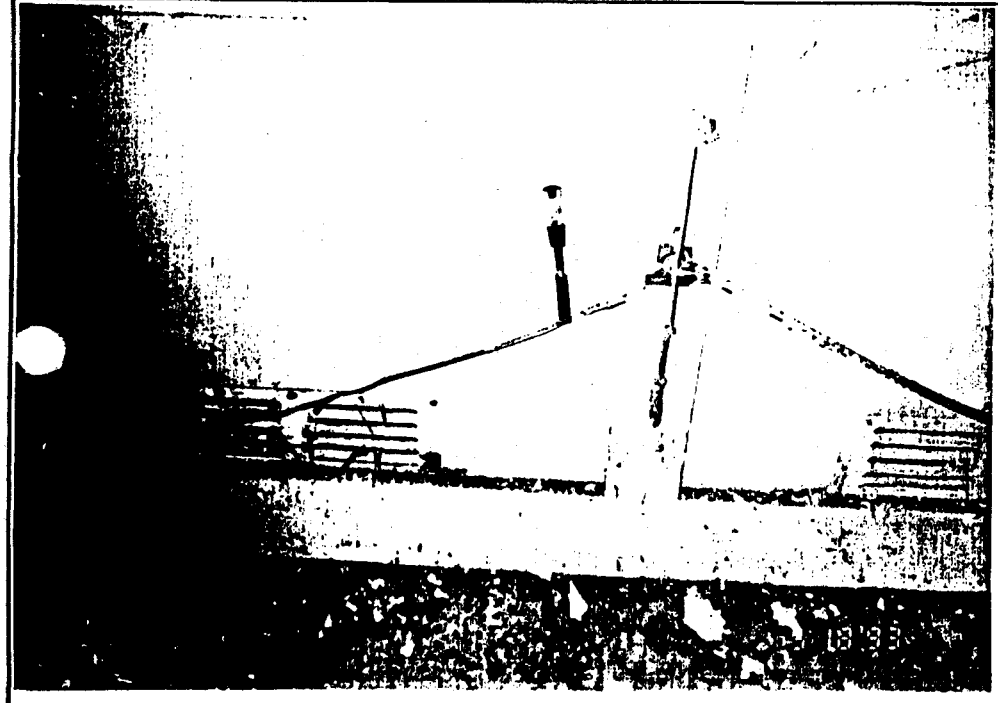
Sample I-3
Exterior window sill by north porch east door



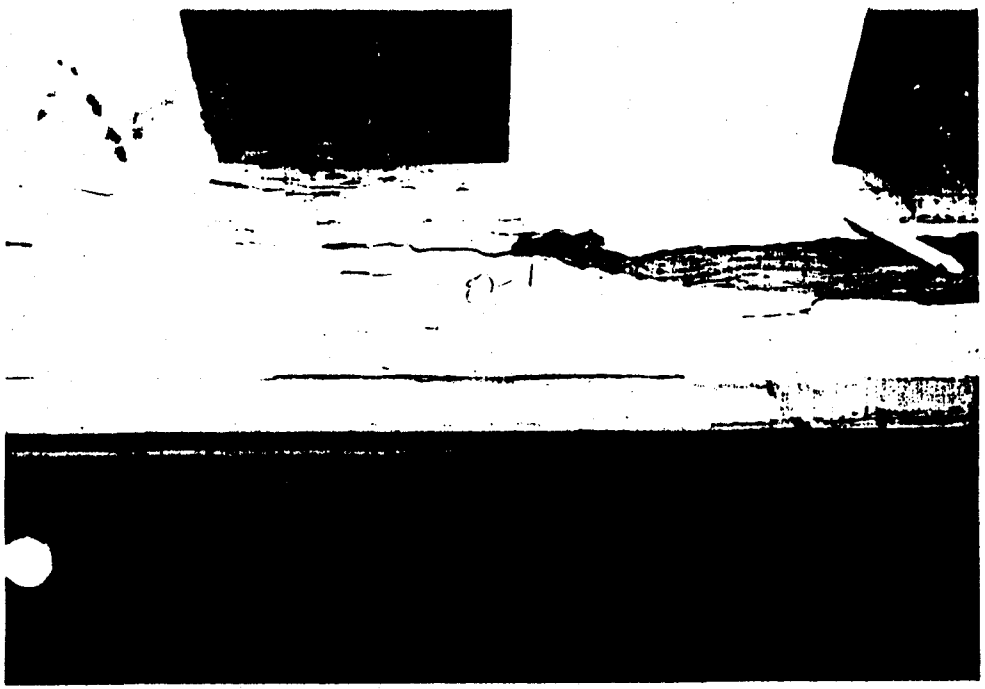
Sample L-1
South room window; exterior well



Sample L-2
Front room picture window

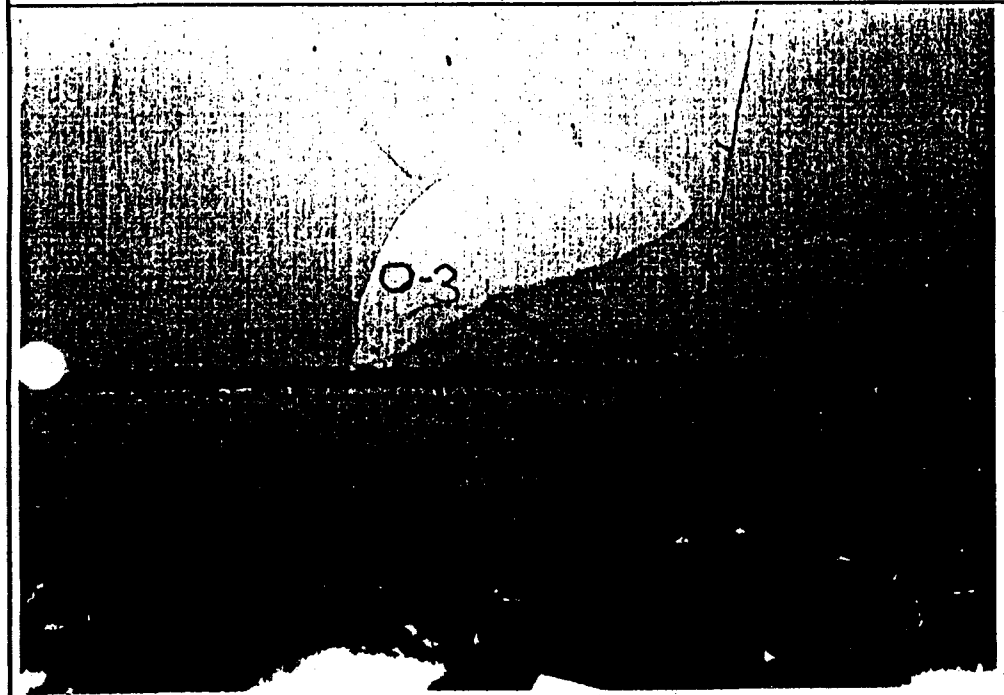


Sample L-3
Garage door; interior



Sample O-1

Sample O-2



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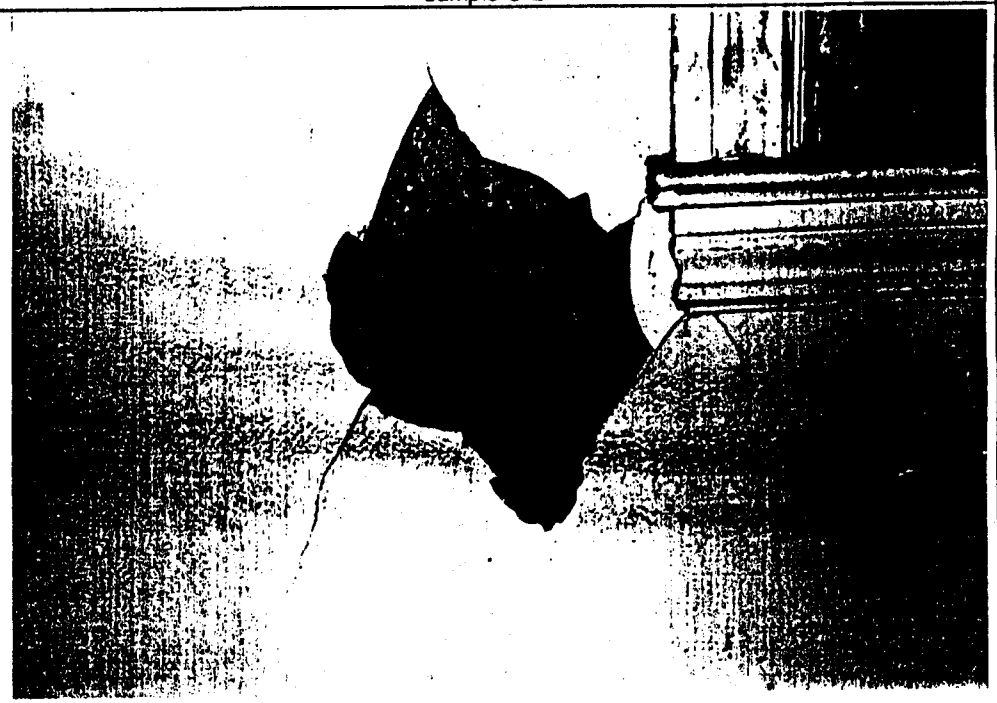
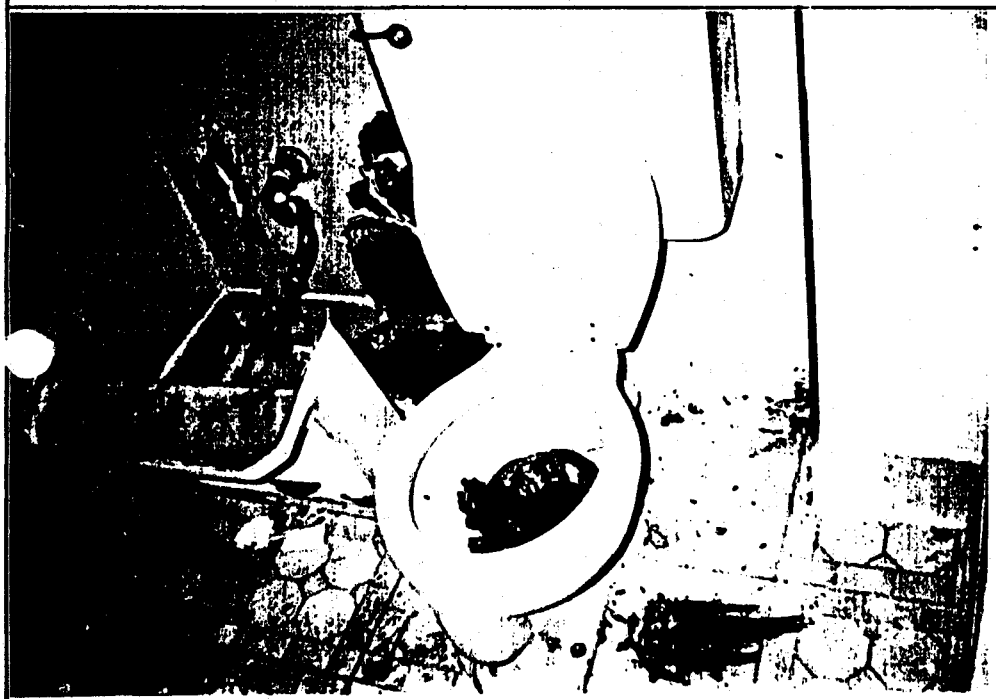


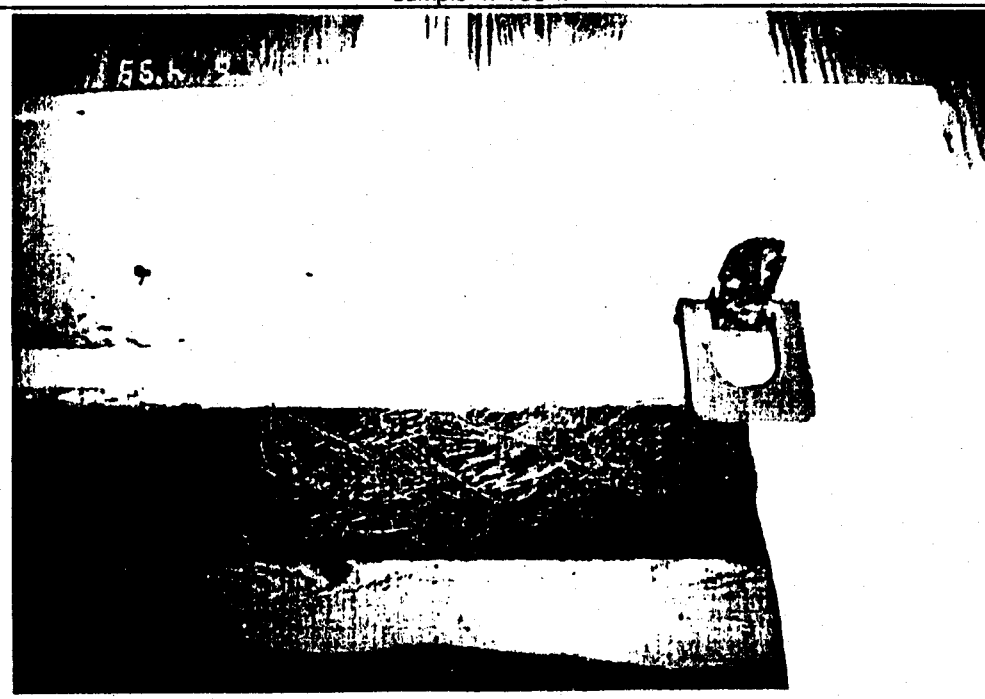
Sample O-4

Sample O-5

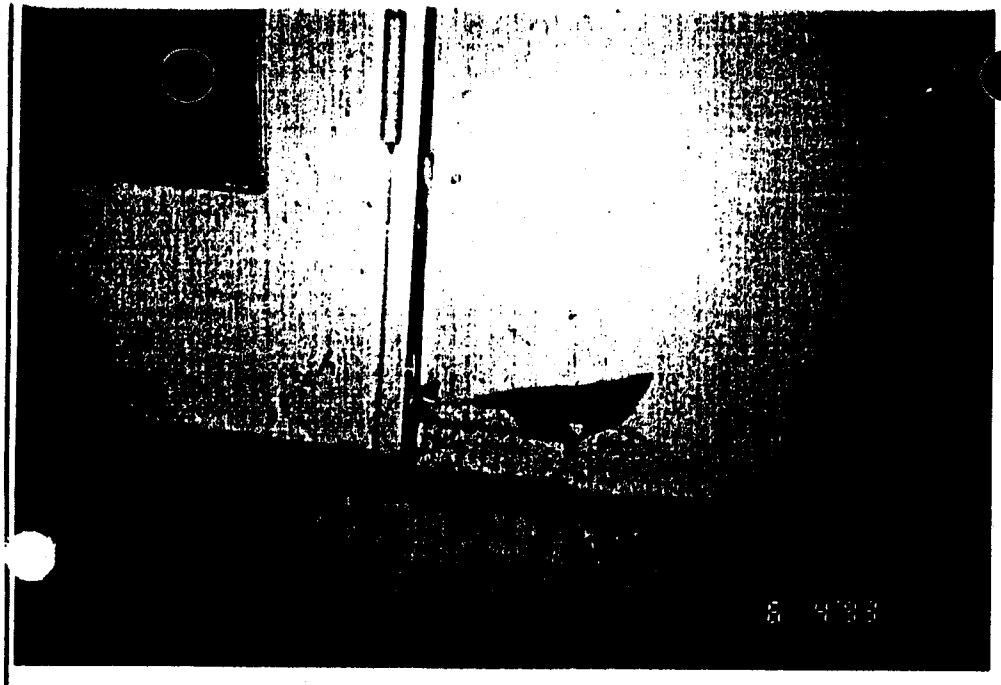
Sample R-105-2



Sample R-105-3

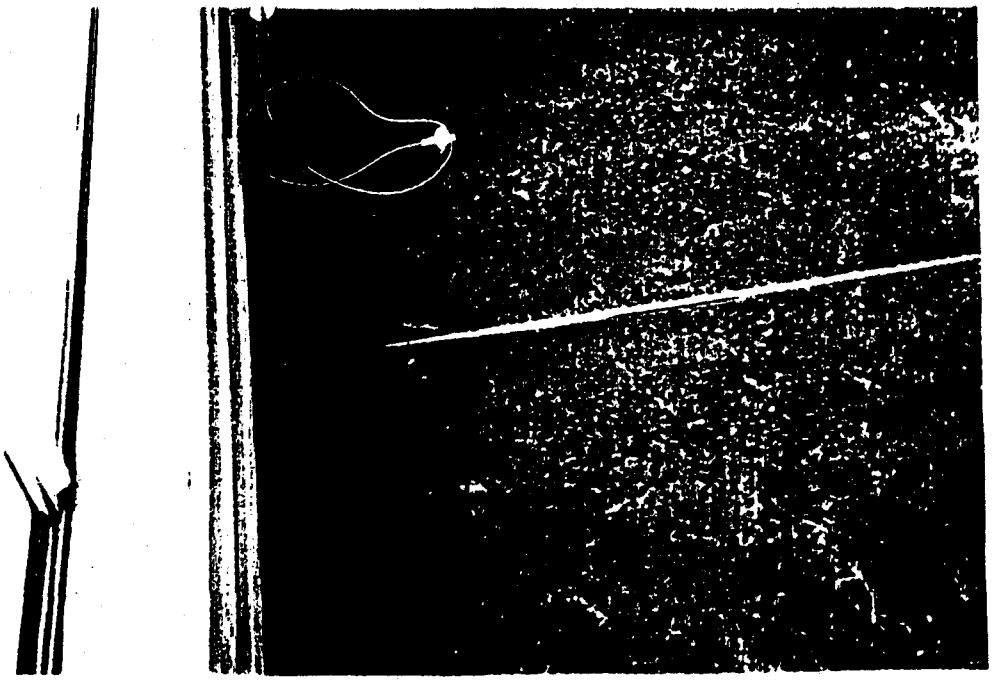


Sample R-105-4

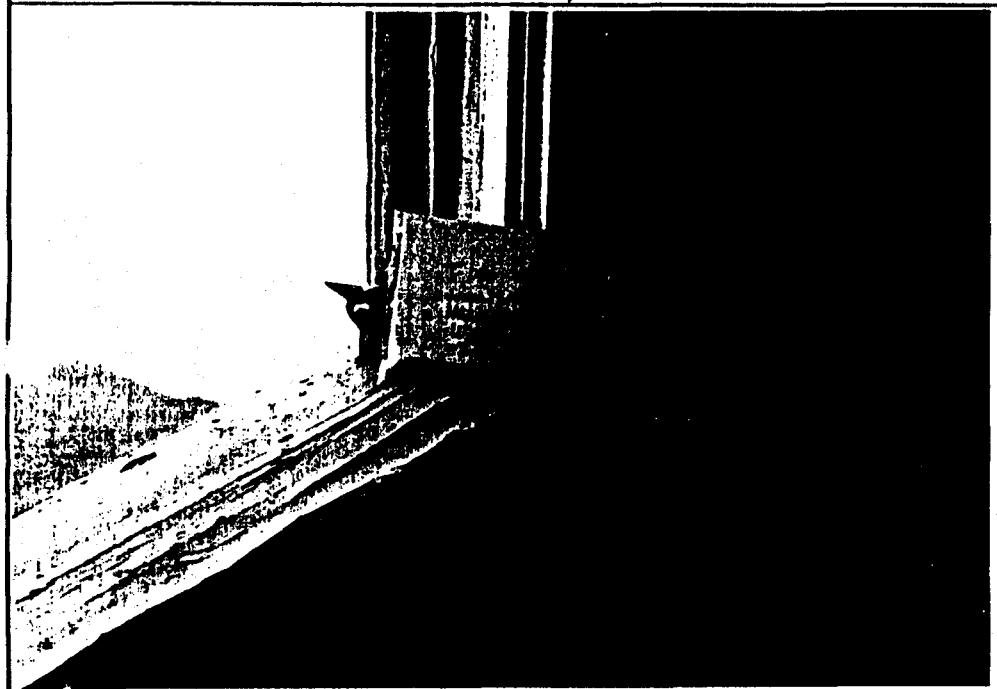


Sample R-105-5

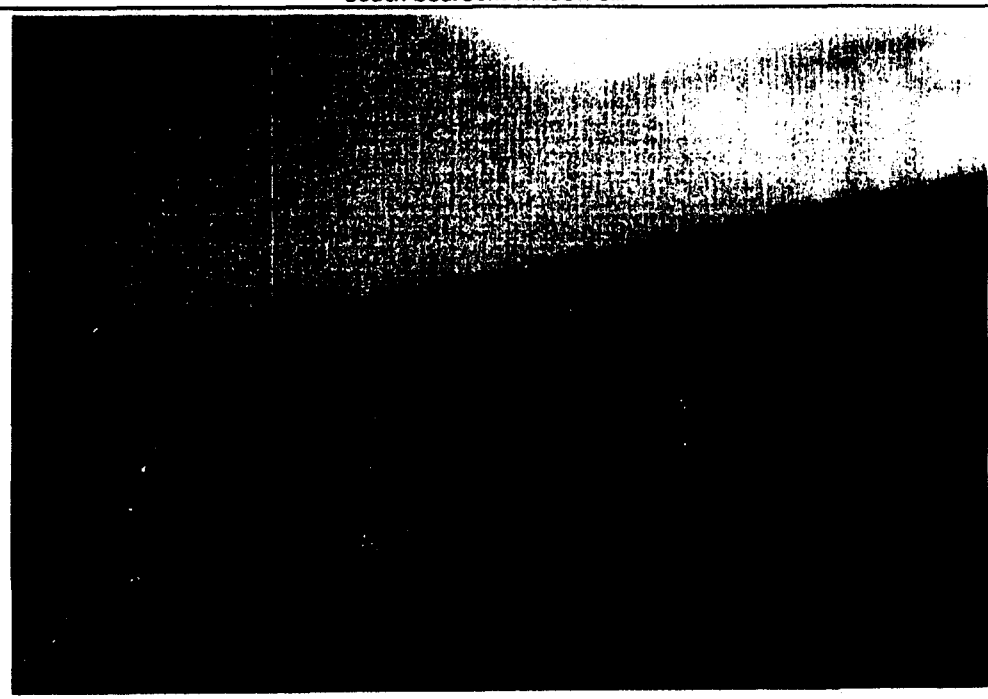
Sample T-1
Kitchen window sill; north end



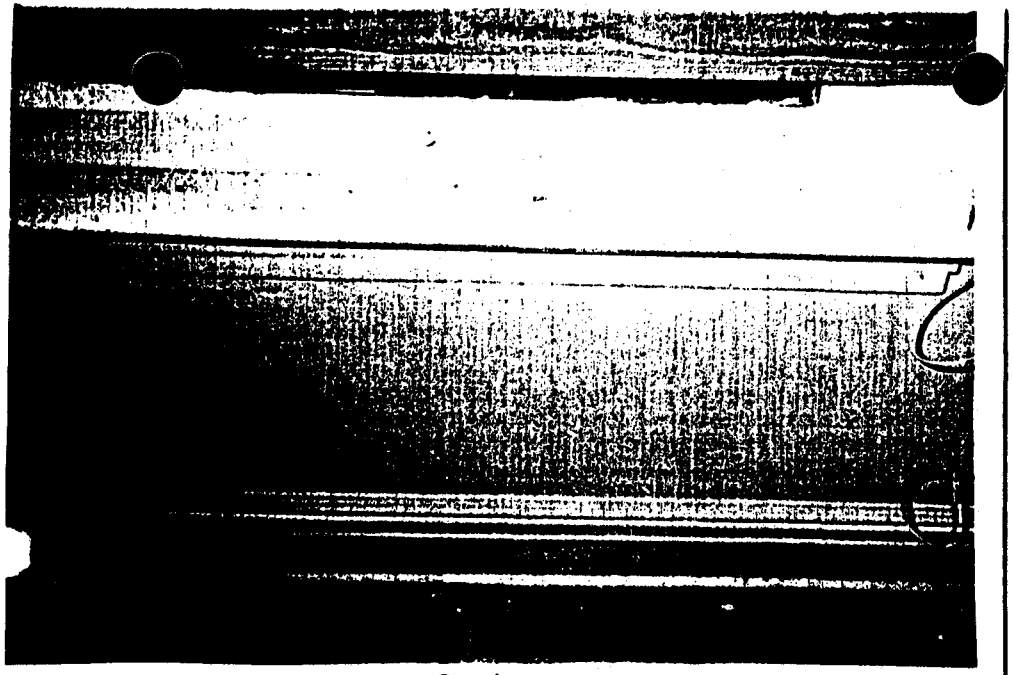
Sample T-2
South bedroom window sill



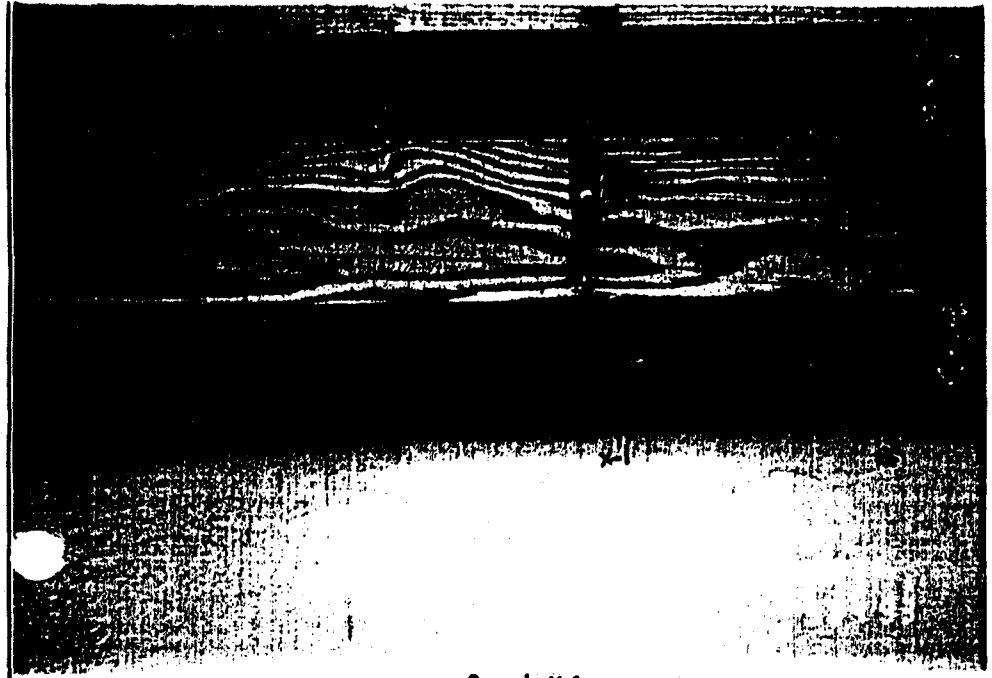
Sample T-3
Middle bedroom window sill



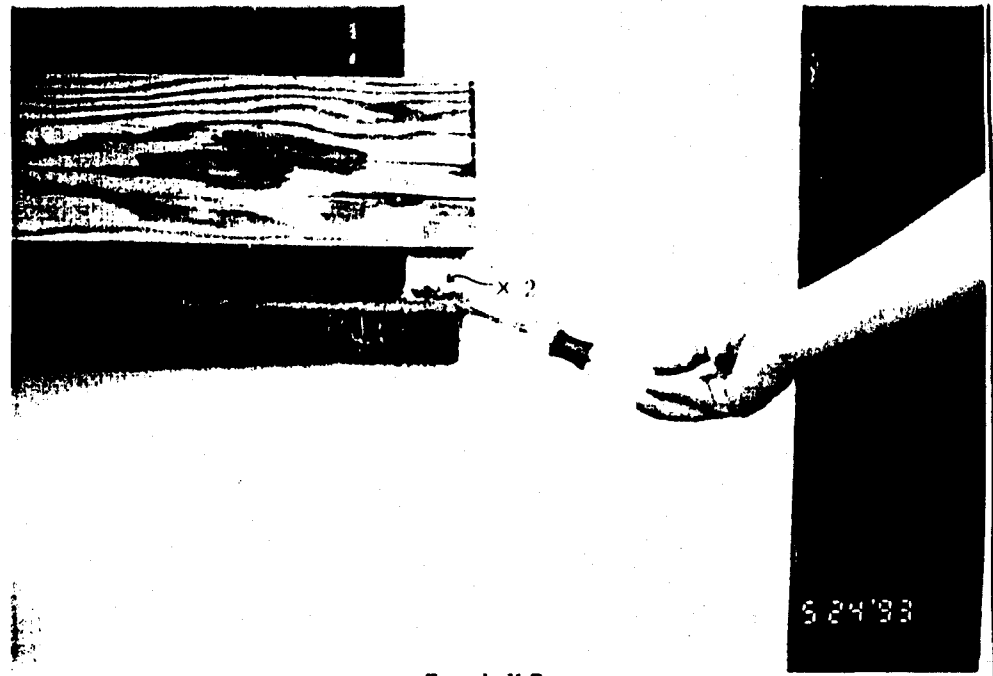
Sample T-4
North bedroom window sill



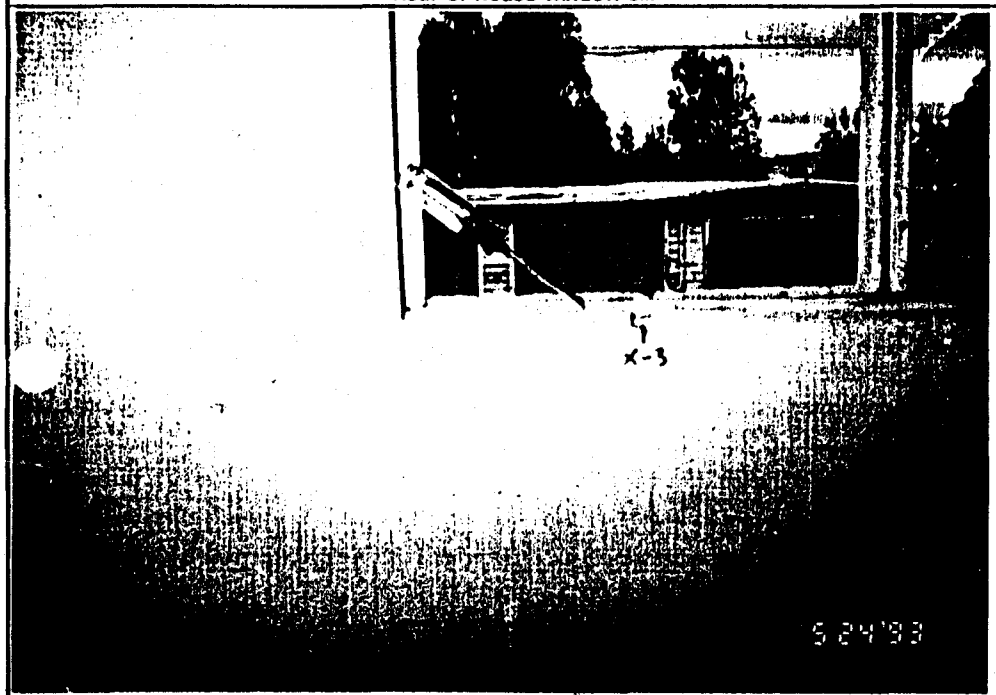
Sample T-5
Dining room window sill



Sample X-1
Rear of house window sill

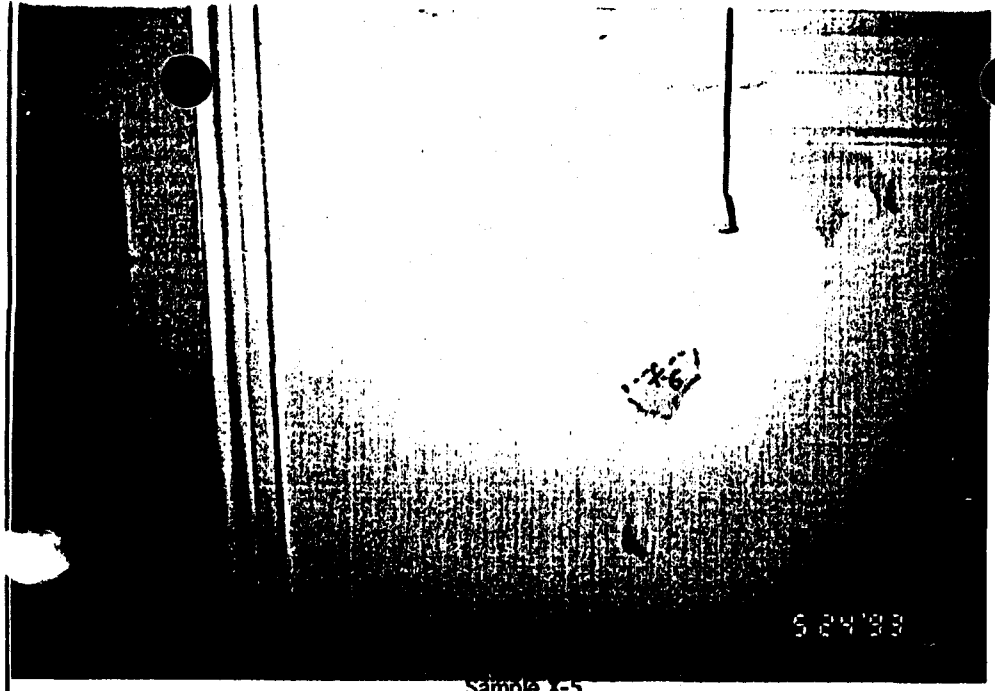


Sample X-2
Rear of house, left of backdoor

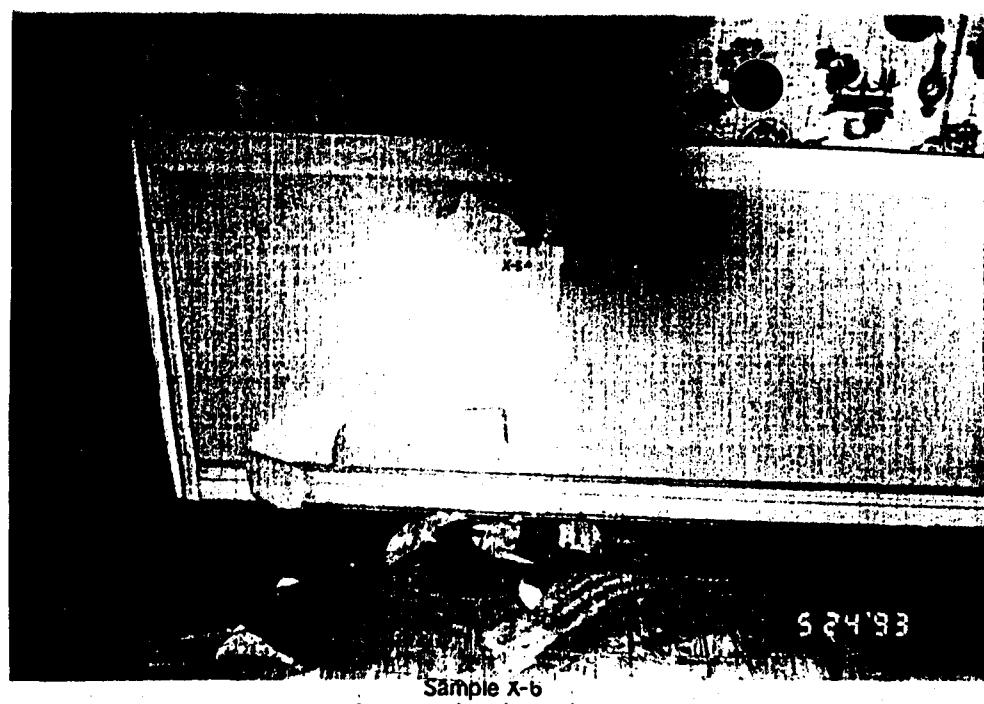


Sample X-3
South Front room window sill

Sample X-4
North rear room window sill



Sample X-5
Kitchen south wall



Sample X-6
Rear porch right of door

CLEAN

DD 2

Contract No. N62474-88-D-5086

Contract Task Order 0142

Navy Head Engineer-in-Charge:	Raymond Ramos
Navy Engineer-in-Charge:	William Radzevich
PRC Project Manager:	Gary Welshans
PRC Assistant Project Managers:	Emir Utush Jim Sickles

Naval Station Treasure Island
Hunters Point Annex
San Francisco, California

DRAFT FINAL

PARCEL A SITE INSPECTION REPORT

Prepared By

PRC ENVIRONMENTAL MANAGEMENT, INC.
120 Howard Street, Suite 700
San Francisco, CA 94105
415/543-4880

and

HARDING LAWSON ASSOCIATES
7655 Redwood Boulevard
Novato, California 94945
415/892-0821

October 15, 1993

Parcel A SI Report
10/15/93

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Deletion Docket #02

May be viewed in its entirety as Administrative Record #2890 at the following repositories:

San Francisco Public Library
Main Library
Civic Center (Larkin St. & Grove St.)
San Francisco, CA 94102
(415) 557-4400

San Francisco Public Library
Anna E. Waden Branch Library
5075 Third St.
San Francisco, CA 94124
(415) 715-4100

Or as EPA Records Center document #3033-00301 at the:

U.S. EPA, Region 9
Superfund Records Center
95 Hawthorne St., Suite 403
San Francisco, CA 94105
(415) 536-2000

CLEAN

DD 3

Contract No. N62474-88-D-5086

Contract Task Order 0142

Navy Head Engineer-in-Charge: Raymond Ramos

Navy Engineer-in-Charge: William Radzevich

PRC Project Manager: Gary Welshans

PRC Assistant Project Managers: Emir Utush
Jim Sickles

Naval Station Treasure Island
Hunters Point Annex
San Francisco, California

DRAFT FINAL
PARCEL A SITE INSPECTION REPORT
APPENDICES A THROUGH K

Prepared By

PRC ENVIRONMENTAL MANAGEMENT, INC.
120 Howard Street, Suite 700
San Francisco, CA 94105
415/543-4880

and

HARDING LAWSON ASSOCIATES
7655 Redwood Boulevard
Novato, California 94945
415/892-0821

October 15, 1993

Deletion Docket #03

May be viewed in its entirety as Administrative Record #2891 at the following repositories:

San Francisco Public Library
Main Library
Civic Center (Larkin St. & Grove St.)
San Francisco, CA 94102
(415) 557-4400

San Francisco Public Library
Anna E. Waden Branch Library
5075 Third St.
San Francisco, CA 94124
(415) 715-4100

Or as EPA Records Center document #3033-00312 at the:

U.S. EPA, Region 9
Superfund Records Center
95 Hawthorne St., Suite 403
San Francisco, CA 94105
(415) 536-2000

Claire, FYI, Bill

Post-it™ brand fax transmitial memo 7671 | Pages ▶ 2
To Claire Trombadore | From Wm. Radzevich
Co. EPA | Co. Navy-WestDiv (Code 18)
Dept. | Phone # (415) 244-2555
Fax # (415) 744-1916 | Fax # (415) 244-2655
7/31/95

HUNTERS POINT ANNEX
SAN FRANCISCO, CALIFORNIA

DD 4

PUBLIC COMMENT INVITED ON THE PROPOSED PLAN ON THE PREFERRED ALTERNATIVE FOR PARCEL A HUNTERS POINT ANNEX

The U.S. Navy will hold a public meeting to discuss the proposed plan on the preferred alternative for the area known as Parcel A at the Hunters Point Annex (HPA), a former naval shipyard in San Francisco, California. The public will be given the opportunity to comment. The meeting will be held on Tuesday, August 22, 1995 from 6:00 p.m. to 8:30 p.m. at the Southeast Community Center, 1800 Oakdale Avenue, San Francisco, California.

Parcel A contains approximately 88 acres that cover the entire upland area and a portion of the lowland area of HPA. As a result of environmental investigations, the Navy was able to conclude that Parcel A soils and groundwater do not pose a significant hazard or risk to human health or to the environment. The Navy's preferred alternative for Parcel A is the No Action alternative.

Complete documentation of the No Action alternative for Parcel A, including the Proposed Plan and the Draft Parcel A Remedial Investigation/Feasibility Study report are available in the information repository maintained at two locations:

City of San Francisco Main Library
Civic Center (Larkin & McAllister Streets)
Phone library for hours
(415) 557-4400

Bayview—Anna E. Wade Branch Library
5075 Third Street
Phone library for hours
(415) 715-4100

The public may comment in person at the public meeting or may submit written comments until September 5, 1995. Comments, or requests for further information may be directed to:

Mr. Michael McClelland
Department of the Navy
Engineering Field Activity West
Naval Facilities Engineering Command, Code 62.3
900 Commodore Way, Building 105
San Bruno, California 94066-2402
(415) 244-3048
(415) 244-3010 (fax)

HUNTERS POINT ANNEX
SAN FRANCISCO, CALIFORNIA

DD 5

PUBLIC MEETING ON THE PROPOSED PLAN ON THE PREFERRED ALTERNATIVE FOR PARCEL A HUNTERS POINT ANNEX

The U.S. Navy will hold a public meeting to discuss the proposed plan on the preferred alternative for the area known as Parcel A at the Hunters Point Annex (HPA), a former naval shipyard in San Francisco, California. The public will be given the opportunity to comment. The meeting will be held on:

TUESDAY, AUGUST 22, 1995 from 6:00 p.m. to 8:30 p.m.
Southeast Community Center
1800 Oakdale Avenue, San Francisco, California

Parcel A contains approximately 88 acres that cover the entire upland area and a portion of the lowland area of HPA. As a result of environmental investigations, the Navy was able to conclude that Parcel A soils and groundwater do not pose a significant hazard or risk to human health or to the environment. The Navy's preferred alternative for Parcel A is the No Action alternative.

Complete documentation of the No Action alternative for Parcel A, including the Proposed Plan and the Draft Parcel A Remedial Investigation/Feasibility Study report are available in the information repository maintained at two locations:

City of San Francisco Main Library
Civic Center (Larkin & McAllister Streets)
Phone library for hours
(415) 557-4400

Bayview—Anna E. Wade Branch Library
5075 Third Street
Phone library for hours
(415) 715-4100

The public may comment in person at the public meeting or may submit written comments until September 5, 1995. Comments, or requests for further information may be directed to:

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Engineering Field Activity West
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San Bruno, California 94066-2402
(415) 244-3048
(415) 244-3010 (fax)

NAVY'S DRAFT FINAL PROPOSED PLAN FOR PARCEL A, HUNTERS POINT ANNEX

DD 6

INTRODUCTION

The U.S. Department of the Navy (Navy), in cooperation with the U. S. Environmental Protection Agency (EPA), the California Department of Toxic Substances Control, and the California Regional Water Quality Control Board for the San Francisco Bay Region, is requesting public comment on this ***proposed plan*** for Parcel A at Hunters Point Annex, San Francisco, California. Based on the Draft Parcel A Remedial Investigation/Feasibility Study Report (Parcel A RI/FS report), the Navy, the lead agency for cleanup activities at Hunters Point Annex, is proposing that "no action" be taken at Parcel A. The Parcel A RI/FS report was prepared as a result of three separate investigations: a preliminary assessment, a site inspection, and a ***remedial investigation*** and a ***feasibility study*** under the Navy's ***Installation Restoration*** program. The Navy conducted the investigations to characterize the nature and extent of environmental contamination at Parcel A; the feasibility study was done to evaluate the best alternative for addressing this contamination.

This proposed plan provides background information on Parcel A, discusses the contamination identified, summarizes the results of the remedial investigation and feasibility study, and describes the Navy's proposed "no action" alternative. It also provides information on public involvement opportunities. The proposed plan does not replace the Parcel A RI/FS report; it is intended as a companion document to the report. This document fulfills the public participation requirements of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Section 117(a), which states that the lead agency must publish a proposed plan outlining the remedial alternative(s) developed in the RI/FS report.

Members of the Bayview Hunters Point community and other interested parties are encouraged to comment on all alternatives detailed in the Parcel A RI/FS report, including the Navy's proposed "no action" alternative and the documents at the information repositories listed on page 6, during the public comment period from August 7 through September 5, 1995. Following the public comment period, the Navy will summarize and respond to comments in a document called a responsiveness summary. Based on the Navy's consideration of the community's comments, the Navy may change the preferred alternative or choose another alternative. A ***Record of Decision (ROD)*** will be signed to document the final cleanup selection.

These documents will then be made available for public review at the information repositories listed on page 6.

PUBLIC MEETING AND COMMENT PERIOD

You are invited to attend a public meeting regarding the proposed plan for Parcel A on

Tuesday, August 22, 1995
6:00 p.m. to 8:30 p.m.
at
Southeast Community Center
1800 Oakdale Avenue
San Francisco, California

At the meeting, Navy representatives will describe the evaluated alternatives and present the preferred alternative. Community members will have the opportunity to ask questions and give oral and written comments on the alternatives. You may submit either oral or written comments at the public meeting, or you can send written comments postmarked no later than September 5, 1995, to

Mr. Michael McClelland
Department of the Navy
Engineering Field Activity West
Naval Facilities Engineering Command, Code 62.3
900 Commodore Way, Building 105
San Bruno, CA 94066-2402

Phone (415) 244-3048
Fax (415) 244-3010

The Navy will consider and respond to your comments before making the final decision.

**Words that appear in bold italics are defined in the glossary on page 6 of this proposed plan.*

FACILITY DESCRIPTION

Hunters Point Annex is in southeastern San Francisco, California, next to San Francisco Bay. Hunters Point Annex consists of approximately 936 acres: 493 acres on land and 443 acres under water. In 1942, during World War II, the Navy began using Hunters Point Annex for various shipyard activities including ship building, repair, and maintenance. After World War II, Hunters Point Annex was used for submarine repair and testing instead of ship repair services. Between 1976 and 1986, the Navy leased most of Hunters Point Annex to Triple A, a privately owned ship repair company. The Navy began preliminary assessments in 1986 to investigate the past use and disposal of hazardous materials at Hunters Point Annex. Due to its past use, and its location near an off-site drinking water source, EPA placed Hunters Point Annex on the National Priorities List (NPL) in 1989, making it a Superfund site under CERCLA. In 1991, the Department of Defense (DoD) listed Hunters Point Annex on the base closure list.

BACKGROUND

Under the Navy's Installation Restoration Program, investigations are conducted in three phases: the preliminary assessment, the site inspection, and the remedial investigation. A preliminary assessment is the first phase of the Installation Restoration Program and involves collecting and reviewing all background information on the site. If further investigation is required, a site inspection is conducted to determine the presence of contamination. If the full extent of the contamination cannot be defined during the site inspection, a remedial investigation is conducted. During the remedial investigation phase the nature and extent of the contamination is determined, and potential risks to human health and the environment are assessed. If the results of the remedial investigation indicate that the contamination may adversely affect human health and the environment, a feasibility study is conducted to evaluate potential remedial alternatives. In the case of Parcel A at Hunters Point Annex, a feasibility study was conducted for the groundwater underlying Parcel A to identify, develop, and evaluate appropriate alternatives for the motor oil detected in groundwater at Parcel A.

Parcel A is one of five geographic parcels at Hunters Point Annex. It contains approximately 88 acres that cover the entire upland area and a portion of the lowland area of Hunters Point Annex. The upland area was used primarily for residential purposes, while the lowland area included office and commercial buildings. Nine sites were identified within Parcel A during the preliminary assessments, including three upland area sites, two lowland area sites, and four parcel-wide sites (see Parcel A Sites Investigated figure).

The three upland area sites are site inspection (SI) SI-19, SI-43, and installation restoration (IR) IR-59 Jerrold Avenue Investigation (JAI). SI-19 consists of two parking medians in front of Building 901, the Officers' Club. The parking medians were suspected of being filled in part with oily material and sandblast grit. SI-43 consists of the area surrounding former Building 906, the Gardening Tool House, which was probably used for pesticide preparation and storage. IR-59 JAI is a residential lot on Jerrold Avenue that was investigated for pesticides and sandblast grit.

The two lowland area sites are SI-41 and SI-77. SI-41 consists of Building 816, the Naval Radiological Defense Laboratory, and Building 818, the Chlorinating Plant. The site was investigated as a former storage area for drums that may have contained hazardous substances. SI-77 is a former underground storage tank, S-812, which was located beneath an asphalt parking lot. The underground storage tank was removed and the site investigated for petroleum hydrocarbon contamination.

The four parcel-wide sites within Parcel A are SI-45, SI-50, SI-51, and IR-59. SI-45 is the portion of the facility-wide steam line system that lies within Parcel A. The steam line system was used to heat buildings and ships docked at the facility, and was suspected of being used by Triple A to transport waste oil. The lines in Parcel A were inspected in order to eliminate the remote possibility for this former use. SI-50 is the portion of the facility-wide storm drain and sanitary sewer systems that lie within Parcel A. In the past, the systems may have been used to dispose of hazardous materials. SI-51 is the portion of the facility-wide site consisting of the areas within Parcel A where electrical equipm

*Words that appear in bold italics are defined in the glossary on page 6 of this proposed plan.

(electrical transformers) containing polychlorinated biphenyls may have leaked. IR-59 encompasses the groundwater underlying Parcel A.

In 1993, the Navy completed the site inspection phase for Parcel A. Details of the site inspection investigations and results are contained in the Parcel A Site Investigation Report, Draft Final, and the Draft Parcel A RI/FS Report. Copies of these documents are available at the information repositories. Table A summarizes the contaminants discovered during the site inspections and the results of the risk assessments.

The new technique of investigation by excavation was used at three of the site inspection sites, SI-19, SI-41, and SI-43 and one remedial investigation site, IR-59 JAI. This new investigative technique was used to characterize the extent of contamination and accelerate the site investigations at Parcel A. During the site inspection phase a backhoe was used to excavate soil suspected of being contaminated or visually stained. Soil samples were then collected and analyzed to determine if further characterization was necessary. The excavated soils were disposed of at appropriate landfill sites, and clean soils were used to fill the excavations.

Evaluation of the data collected during the site inspections included both a ***human health risk assessment*** and a ***qualitative ecological risk assessment*** (conducted by EPA). The ***risk assessments*** indicated that the soils left in place after investigation by excavation at Parcel A do not pose a significant hazard or threat to human health or the environment. Since contaminated soils were excavated during site characterization, the Navy determined that seven of the nine Parcel A sites (SI-19, SI-41, SI-43, SI-45, SI-50, SI-51, and SI-77) investigated did not require further investigation or remedial action. Therefore, this proposed plan does not address those seven sites.

TABLE A SUMMARY OF SITE INSPECTION RESULTS FOR PARCEL A SITES REQUIRING NO FURTHER INVESTIGATION

SITE	CONTAMINANTS DISCOVERED DURING SITE INSPECTIONS	RISK ASSESSMENT RESULTS
SI-19	***Semivolatile organic compounds*** Pesticides Polychlorinated biphenyls Petroleum hydrocarbons Metals	Soil characterized during the investigation by excavation was replaced with clean soil. Soils remaining do not pose a threat to human health or the environment.
SI-41	***Volatile organic compounds*** Semivolatile organic compounds Petroleum hydrocarbons Metals	Soil characterized during the investigation by excavation was replaced with clean soil. Soils remaining do not pose a threat to human health or the environment.
SI-43	Volatile organic compounds Semivolatile organic compounds Pesticides Herbicides Polychlorinated biphenyls Petroleum hydrocarbons Metals	Soil characterized during the investigation by excavation was replaced with clean soil. Soils remaining do not pose a threat to human health or the environment.
SI-45	No contamination was found.	No threat to human health or the environment.
SI-50	Pesticides Herbicides	No threat to human health or the environment.
SI-51	No contamination was found.	No threat to human health or the environment.
SI-77	Volatile organic compounds Semivolatile organic compounds Petroleum hydrocarbons Metals	No threat to human health or the environment.

**Words that appear in bold italics are defined in the glossary on page 6 of this proposed plan.*

SUMMARY OF REMEDIAL INVESTIGATIONS

A remedial investigation was conducted for sites IR-59 JAI (soil) and IR-59 (***groundwater***). Analytical results of the contaminants discovered during the remedial investigations and the results of the risk assessments are summarized in Table B and are discussed below.

IR-59 JAI Soil Investigation

During the remedial investigation, the extent of the contamination at IR-59 JAI was evaluated using a new field screening test method and investigation by excavation. The field screening test method is a qualitative method for detecting pesticides (total DDT) in soil. This test method is used in the field and allows rapid qualitative screening for total DDT. Soils containing semivolatile organic compounds, pesticides, petroleum products such as motor oil, and metals were excavated to evaluate the extent of contamination. The excavated soils were disposed of off site at an appropriate landfill.

The primary purpose of investigation by excavation at IR-59 JAI was to characterize pesticides contamination. The extent of pesticide contamination was evaluated using a field screening test method. Selected soil samples were sent to a laboratory for confirmatory analysis. The results of the field screening test method were found to be more conservative than the laboratory results; as a result, the Navy excavated more soil than necessary. The results of the tests also indicate that the soil left in place after the investigation by excavation does not pose a threat to human health or the environment.

IR-59 Groundwater Investigation

The remedial investigation at IR-59 was conducted to evaluate Parcel A groundwater contamination. The results of the investigation showed low levels of semivolatile organic compounds, motor oil, and metals in the groundwater. A total of six wells were installed for this investigation. Motor oil was found in two small, localized areas: the parking lot spring in front of Building 101 and in a single well in Jerrold Avenue. Based on the analytical results, the Navy and the Regional Water Quality Control Board for the San Francisco Bay Region concluded that the concentration of motor oil detected in the groundwater within the Parcel A bedrock does not require further investigation, remediation, or monitoring. The levels of semivolatile organic compounds and metals detected were below federal and state drinking water standards and do not pose a threat to human health or the environment.

ASSESSMENT OF ECOLOGICAL AND HEALTH RISKS

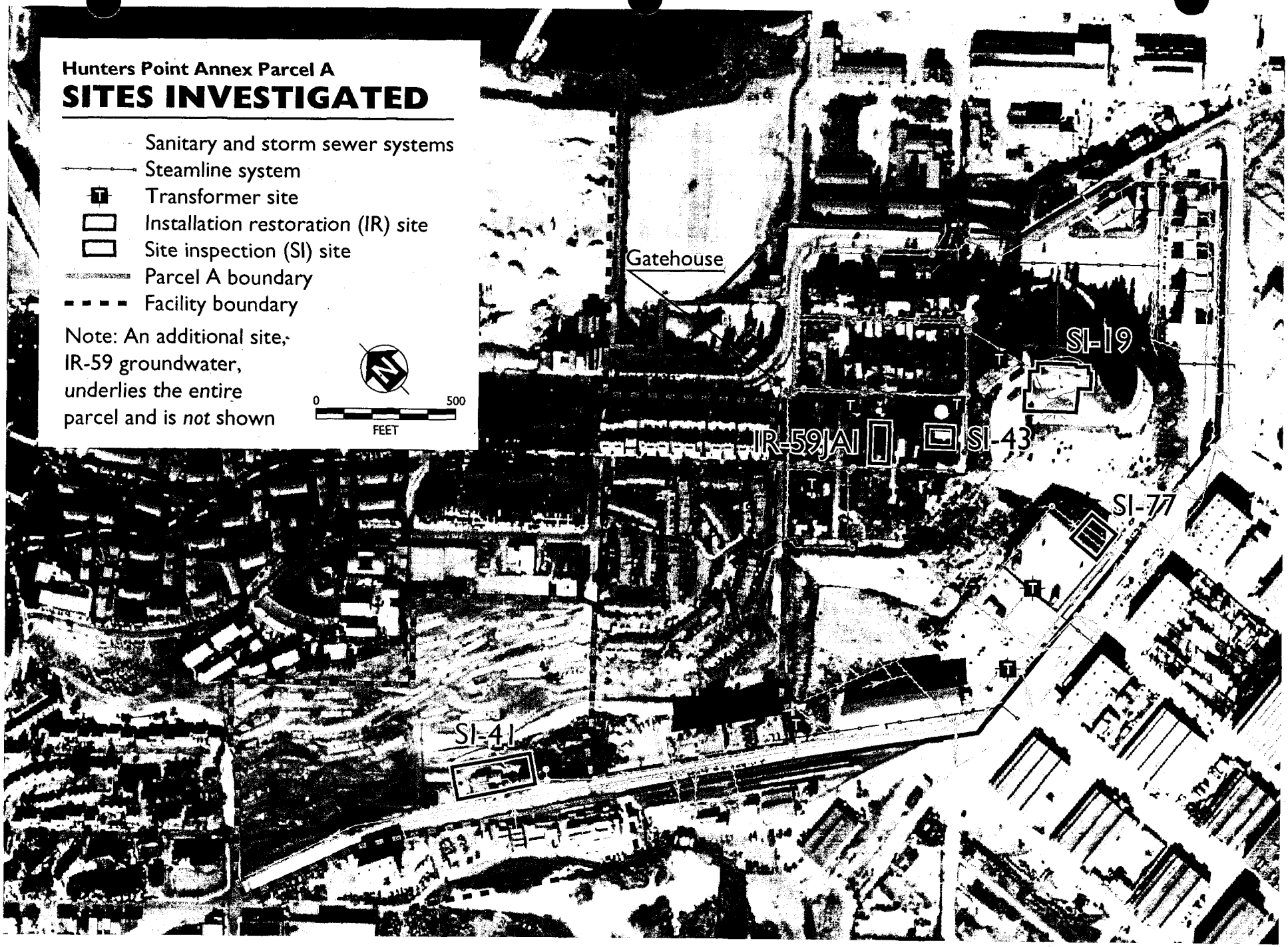
In 1994, the EPA conducted a qualitative ecological risk assessment and concluded that due to the limited habitat, scarcity of potential receptors, and low contaminant levels, risks to ecological receptors are minimal at Parcel A.

In 1993, the Navy conducted human health risk assessments to examine the potential future risks to public health from contamination at the seven Parcel A site inspection sites. In 1995, at the request of the regulatory agencies, the Navy reexamined the potential future risks to public health at the seven site inspection

TABLE B SUMMARY OF REMEDIAL INVESTIGATION RESULTS FOR PARCEL A SITES REQUIRING NO FURTHER INVESTIGATION

SITE	CONTAMINANTS DISCOVERED DURING REMEDIAL INVESTIGATIONS	RISK ASSESSMENT RESULTS
IR-59 JAI	Semivolatile organic compounds Pesticides Petroleum hydrocarbons Metals	Soil characterized during the investigation by excavation was replaced with clean soil. Soils remaining do not pose a threat to human health or the environment.
IR-59	Semivolatile organic compounds Petroleum hydrocarbons Metals	No threat to human health or the environment.

**Words that appear in bold italics are defined in the glossary on page 6 of this proposed plan.*


Hunters Point Annex Parcel A
SITES INVESTIGATED
Sanitary and storm sewer systems
Steamline system
Transformer site
Installation restoration (IR) site
Site inspection (SI) site
Parcel A boundary
Facility boundary
Note: An additional site, IR-59 groundwater, underlies the entire parcel and is not shown
0
500
FEET
Gatehouse
SI-19
IR-59JAI
SI-43
SI-77
SI-41

sites. In addition, as part of the remedial investigation, a risk assessment was conducted for the remedial investigation sites. The risk assessments compared contaminant levels found at each of the sites during the site inspection and remedial investigations with state and federal health and environmental levels; considered how the public could be exposed to contamination; and evaluated whether the site-related contaminants pose a threat to human health and the environment.

The 1995 remedial investigation risk assessment identified three possible ***exposure pathways*** (that is, ways the public could be exposed to the contaminants in the future) that might be subject to cleanup actions under the Navy's Installation Restoration Program:

- Contact with surface soil at Parcel A by future residents
- Ingestion of fruits and vegetables that may be grown at Parcel A
- Use of the aquifer beneath Parcel A for water supply

Risks from Exposure to Surface Soil

During site characterization to determine the extent of contamination, surface soil was excavated and replaced with clean soil at four of the nine sites (See Tables A and B). This eliminated possible exposure to contaminants though inhalation (breathing), ingestion (eating), and dermal (skin) contact.

Risks from Ingestion of Fruits and Vegetables

Fruit trees and vegetables grown at Parcel A may absorb contaminants present in the soil. Since contaminated surface and subsurface soil was replaced with clean soil, the risk of cancer was reduced to within EPA's acceptable range of potential risk. The risk assessment found that ingestion of fruits and vegetables may potentially cause other health effects such as weight loss. However, a child (0 to 6 years) would have to eat approximately 30 pounds of fruits and vegetables grown at the site each year for six years before the child's health could potentially be adversely affected.

Risks from Exposure to Groundwater

The groundwater aquifer beneath Parcel A does not produce enough water to be a drinking water source and has not previously been used as a drinking water source. The only possible routes of exposure to the groundwater are dermal contact or ingestion of the water at the spring area near Building 101. Therefore, further investigation of this exposure pathway was determined to be unnecessary. In addtion, the analytical results of the remedial investigation indicated that the concentrations of semivolatile organic compounds, motor oil, and metals present does not pose a threat to human health or the environment.

DESCRIPTION OF THE "NO ACTION" PREFERRED ALTERNATIVE

Based on the results of the remedial investigation, the EPA recommended that a feasibility study was not necessary for sites IR-59 JAI or IR-59 (groundwater). The recommendation was made because the soils left in place after investigation by excavation at IR-59 JAI pose no threat to human health and the environment. Nevertheless, the Navy conducted a feasibility study to identify, develop, and evaluate appropriate alternatives for the motor oil detected in groundwater at Parcel A. The Navy proposes that "no action" be taken at IR-59.

The results of the remedial investigation at IR-59 showed that the levels of semivolatile organic compounds, motor oil, and metals detected in the groundwater at Parcel A are below federal and state drinking water standards and do not pose a threat to human health or the environment. The Navy recommends a "no action" alternative because it is protective of human health and the environment.

The "no action" alternative would not restrict the use of, or exposure to, groundwater at Parcel A. Additionally, the Navy would require no monitoring of the groundwater. No cost is associated with the "no action" alternative.

**Words that appear in bold italics are defined in the glossary on page 6 of this proposed plan.*

GLOSSARY

Exposure Pathway - The way a chemical or physical agent contacts a living organism.

Feasibility Study - A study to identify, screen, and compare alternatives for a site cleanup.

Groundwater - Water present in the spaces between soil grains.

Human Health Risk Assessment - An analysis of the potential negative health effects on humans caused by hazardous substance releases from a site.

Installation Restoration (IR) - A designation for a site that has undergone a preliminary assessment and site inspection under CERCLA and has been recommended for remedial investigation. The designation is based on the detected presence of hazardous substances and the need to adequately characterize the substances' nature and extent.

Proposed Plan - A document which reviews the cleanup alternatives presented in the feasibility study, summarizes the recommended alternative(s), explains the reasons for recommending them, and solicits comments from the community.

Qualitative Ecological Risk Assessment - A qualitative evaluation performed in an effort to define the risk posed to ecological receptors or the environment by the presence or potential presence and/or use of specific pollutants.

Record of Decision (ROD) - A public document that selects and explains the cleanup alternative(s) to be used at a site. The ROD is based on information from the remedial investigation and feasibility study and public comments and concerns.

Remedial Investigation - An investigation to identify the types, amounts, and locations of contamination at a site.

Risk Assessment - A scientific procedure that uses facts and assumptions to estimate the potential adverse effects on human health and the environment.

Semivolatile Organic Compounds - Hydrocarbons or volatile organic compounds with low evaporation rates such as laboratory cleaner phenol, pesticides, diesel, and motor oil.

Volatile Organic Compounds - carbon containing chemicals that evaporate easily at room temperature, commonly used in dry cleaning, paint stripping, metal plating, and machinery degreasing.

INFORMATION REPOSITORIES

The Navy maintains two information repositories for Hunters Point Annex that contain project documents (including the Parcel A RI/FS report), fact sheets, and other reference materials. The Navy encourages you to review these documents to gain a more complete understanding of the investigations that have been conducted at Parcel A.

City of San Francisco Main Library
Civic Center
San Francisco, CA 94102
(415) 557-4400

Anna E. Waden Branch Library
5075 Third Street
San Francisco, CA 94124
(415) 715-4100

Please call the respective libraries for business hours.

of this proposed plan.

FOR MORE INFORMATION

If you have any questions about Parcel A at Hunters Point Annex please contact:

Mr. Michael McClelland
Department of the Navy
Engineering Field Activity West
Naval Facilities Engineering Command, Code 62.3
900 Commodore Way, Building 105
San Bruno, California 94066-2402
Phone (415) 244-3048, Fax (415) 244-3010

MAILING LIST

If you would like to be included on the Navy's mailing list for Hunters Point Annex, please fill out, detach, and mail this form to Mr. Michael McClelland at the address below.

NAME: _____

MAILING ADDRESS: _____

CITY: _____ **STATE:** _____ **ZIP:** _____

fold here

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900 Commodore Way, Building 105
San Bruno, California 94066-2402

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HUNTERS POINT ANNEX

PARCEL A PROPOSED PLAN

PUBLIC MEETING

SOUTHEAST COMMUNITY CENTER

1800 OAKDALE AVENUE

SAN FRANCISCO, CALIFORNIA

AUGUST 22, 1995

6:00 P.M. - 8:30 P.M.

REPORTED BY: PAUL SCHILLER, CSR #1268

(The meeting was called to order by LCDR Chuck Heron at 6:35 p.m.)

LCDR HERON: Good evening. I'm LCDR Chuck Heron from EFA West, down the road a piece, in San Bruno.

I would like to welcome you all here. First, I really appreciate your turning out; and I would like to take this opportunity to state the purpose of this meeting; and that is, basically, we feel that it is important that we get your input; because as an important part of the decision-making process, this meeting has been set up to give the community members an opportunity to provide both oral and written comments on the proposed plan for Parcel A at Hunters Point Annex.

Prior to taking comments, we will be giving a brief overview of the proposed plan and answer and clarify questions you may have on the overview of Parcel A.

You notice there are tables in the

back to sign up, and they also have speaker sign-up cards. There are some handouts and refreshments in the back.

The restrooms are out a couple of doors on your left, and the water fountain and the phone is upstairs, in case you need to make phone calls.

Before I get into the agenda, there are a couple of other people I would like to introduce.

First of all, Richard Powell, who is lead RPM at Hunters Point here; and Bill Radzevich is also RPM at Hunters Point Annex.

From PRC, we have Scott Weber, Lynne Haroun, Diana Auyueng, and Jim Sickles.

From BCT, we have Mike McClelland, who is from the Navy, who's our environmental coordinator, and Claire Trombadore and Cyrus Shabahari. Cyrus is from Cal EPA, and Claire is from U.S. EPA.

Without further ado, let me just go into the agenda real quickly:

Some of you may have picked up the agenda on the back table. We are into "Welcome and Introduction" part; and in a few minutes, we will move on to the presentation and discussion of the proposed plan, which will be given by Richard Powell.

Then we will have a break from 6:50 to seven o'clock, and that's an opportunity to go around and mingle again and look at the posters and questions that you may have of us, and come back at seven o'clock for some public comments, and then we will plan on adjourning around 8:25, 8:30-ish.

Some basic ground rules:

We want this to be fair to everyone. As I said, we will be using the sign-up sheets for speaker cards, so we will take those in the order that they come in, and I will announce the person.

If you would then come forward to the center microphone, state your name and what organization you are with or what community, and we will get that on the public record.

We will try to keep our comments to three or four minutes; but if you need to go over that, it depends on how many people want to speak tonight.

All comments will be taken down by the court reporter there in front of me, and he is here to make sure that all the oral comments are properly reported.

The responses to these comments may not be given tonight, but they will be part of the record, and they will be provided in writing, and the responses in the summary and the record of decision, which is scheduled to be available at the end of November of 1995.

It will be included in the City of San Francisco Main Library and the Anna Waden

Branch Library.

Those who do not wish to provide oral comments, we welcome your written comments; and those forms are in the back of the room as well.

The total number of written comments and the people that submit written comments, I will voice those toward the end of the evening tonight so that the names and the fact that they had submitted written comments will be entered into the public record.

Both oral and written comments will be a matter of the public record from tonight on out.

The idea is that we will be taking written comments until the 5th of September, so if you do have written comments you don't give us tonight, the people who do have them, make sure they get them postmarked by 5 September.

With that, I would like to introduce Richard Powell, who is our lead RPM for Hunters

Point; and he has an overview of the proposed Parcel A Plan.

MR. POWELL: Good evening. I'd like to welcome you to this Bayview Hunters Point community meeting.

My name is Richard Powell. I'm an environmental engineer, and I work for the Navy. Tonight's meeting is being sponsored by the Navy in cooperation with the United States Environmental Protection Agency and the California Environmental Protection Agency.

I've worked for the Navy for about 15 years; and although my office is in San Bruno, I've spent the last ten years working on projects at the Hunters Point Shipyard. At present, I'm a member of a project team which is working on the hazardous waste investigation and cleanup program at the shipyard. That program is the reason we're here tonight. We want your comments and thoughts on the Navy's proposed plan to finish the Parcel A

investigation and cleanup, and we have provided a public comment period following the break. Successful completion will allow the City of San Francisco to reuse Parcel A.

In order to start the discussion between us, I'd like to present some background information on our program and provide some details on Parcel A.

The Navy began its hazardous waste program in response to public concern that forgotten wastes might exist on Navy bases; and if it did, it might damage public health or damage the environment. At the Hunters Point Shipyard, we began by trying to find all the places where these wastes might be located. We did this by interviewing past and present shipyard workers, looking through old records, and checking old photos. Some suspected problem areas, which needed more study, were found. This included nine areas in Parcel A. With some help from Bill

Radzevich, who is also a member of the project team, and this aerial photo, we can look at Parcel A in greater detail.

On the photo, you can see the PG&E plant; and although it's not shown, Candlestick Park is right about here. (Indicating). The shipyard is about 1,000 acres in size. Something you may not realize is that about 500 acres is dry land, the shipyard as you see it here; and the other 500 acres is offshore underwater.

Trying to study and clean the entire 1,000 acres is very difficult and expensive. In order to make this problem more manageable, the project team divided up the 1,000 acres into smaller parcels. We now work on six parcels, A through F, as shown on this photo. Parcel A is about 90 acres in size. In the past, Parcel A has been used for housing and light commercial activities. It was not used for heavy industrial activities.

Despite its past use as residential and commercial, we did find nine areas within Parcel A which needed to be checked. These areas, which are described in detail in the proposed plan, are typically small vacant lots next to buildings or they are underground utilities, like sewers, tanks or steam lines. The project team also decided to check the water underneath Parcel A. The chemicals we looked for were things like the pesticide DDT, motor oil, PCB's, industrial cleaning solutions, copper and lead.

By using both old and new sampling methods, soil and groundwater in these nine areas were tested to see if chemicals were present and, if they were, how much there was in each area. One new sampling method that the project team used was called "Investigation by Excavation." This method included reducing contamination by digging out small amounts of soil at the same time the testing samples were gathered. It's sort of a

clean-as-you-go approach.

Once the project team had good information on the amount and location of the chemicals, we compared that information to public health and environmental standards. The comparison, which is called a Risk Assessment, included looking at the ways a person might be exposed to contamination. At Parcel A, the team looked at what might happen if people touched the soil, used the underground water, or ate garden produce grown on Parcel A. When the Risk Assessment was finished, it showed that Parcel A is now safe and can be reused by the City.

The project team looked at two alternatives for completing the work in Parcel A. The first alternative was no further action. The second alternative was limited action, which included deed notification of low levels of motor oil in the underground water and sealing of the wells used during the study.

The Navy is recommending the no action plan, because it protects human health and it protects the environment. However, the final decision on the Parcel A plan will not be made until all public comments have been received and reviewed. The final plan will be developed by the Navy in cooperation with the United States EPA and the California EPA. All Parcel A project documents and other reference materials are available for your review at the Branch Library at 5075 Third Street and the Main Library at the Civic Center.

That finishes our formal presentation. If I can clarify anything that I covered in my talk, we do have some time for questions. If you have questions or comments which you would like in the public record and answered in the final report, please hold them until after the break. The project team will be available to speak to you during the break.

On behalf of the project team, thank you for your interest in our program.

LCDR HERON: Thank you, Richard.

At this time, I will open up the floor for any clarifying questions on what Richard was addressing. Bear in mind that, after the break, there will be a comment period; but this is an opportunity for any questions, specifically if there was something that maybe you did not think Richard said clearly enough or you did not catch something; so we will open up the floor for questions.

Please state your name.

MR. CHARLES WALKER: I'm Charlie Walker, a member of the RAB Board.

I'm vehemently opposed to this meeting this afternoon, because the same people that are here now will be at that meeting tomorrow.

This meeting we give of our time, and

they don't pay us no compensation. You get paid, the Navy gets paid, PRC gets paid. People in this community don't get a dime. You all called the meeting and don't have the common courtesy to do it before the RAB Board, before the people in my community. My organization appointed me to do -- other people in this community to be involved. This grossly affects African-American people in this community.

But what I don't understand is, they look to Espanola, they look to me, but they ain't going to show up until something goes haywire.

This is taking unfair advantage of us to have this meeting. You did not bring it before the Board; you were supposed to do it last week, the last meeting; but the place got confused so you ended up not having a meeting. So you all turned around and are having a meeting today, all of us unprepared on what you're talking about.

And what I don't understand is what

is the rush to do this today; and tomorrow morning at nine o'clock with the same people in this room now, we're going to be here.

Now, if this is not a part of tomorrow, I might be able to understand it. But this is going to be a large part of tomorrow. Instead of that, instead of us being able to participate as members of the Board of Directors and the way we were promised we would be able to do -- I'm not in the military -- as a military officer over me that directly involves our community or what you're going to do -- and we ain't got no say-so. And that ain't the way this was supposed to work, and I ain't got nothing against you because you're in the Navy, but the Navy has not seen fit to see to it that PRC do less than 2% of employing our people in this community.

They know it is the biggest violator of all; they studied it; it's the worst

construction company in the world is PRC. I know it; they know it; and I don't mind telling them; and it's not because they have a black representative; they always have a black representative with these companies that they intend to drive over the African-American people.

And I am saying tonight that I don't understand -- and you can explain it -- why you're having this meeting tonight.

The Board of Directors have not been apprised of it. The first thing I knew about this meeting -- and I have been to every meeting; it is not because I don't come to the meeting; I come to every one of these meetings; and we didn't know nothing about it.

You are having it tonight, so we are going to it tomorrow, and the same people are here. What is the rush to have this meeting tonight?

I would like for you to postpone this

meeting until the Board of Directors have an opportunity to listen and look at it first. That's what you appointed us to do; that's what we have given our time with no compensation to represent this community. Espanola Jackson, we got the man we are paying from BBI. These are the people in our community. I don't know where these other people come from. I don't know what you're talking about they are speaking for.

I don't know that what you're talking about that this is a community meeting -- this ain't no community meeting. If you would consult with the people that come to the meeting all the time and tell us, then you will have some people there. We can do this.

If you want newspaper time, if you want to do this -- I tried to explain to you what it is going to take. You wouldn't listen. Now the same people are here. What is the rush to have this meeting, Lt. Commander -- I think it is

Lt. Commander. What is the rush to have this meeting when it was supposed to go before the Board of Directors first? Why are you doing this to us?

If you do it today, you will do it from now on. You will continue to find ways to circumvent the process that you all set up. We didn't do it. President Clinton said they needed community input and the RAB Board or Restoration Advisory Board.

Now, we pay that man, BBI, to do the very thing; and here we are at a meeting that we don't know nothing about, that none of us know nothing about this meeting.

And what about some advice for us? You all give me twenty books, "Study this, Charlie." I told you and I told him, I told the public, none of us understand the language in those books, that great big book, I got one on my desk. I tried to read that book and fell asleep

after the first paragraph, mainly not because I'm ignorant, I don't understand what the words mean.

I have no one to consult with. You all told us that the EPA was going to supply us with those persons or that person. We have been with you for two years; they have not supplied it. The EPA has spent more than $200,000 trying to administer $50,000 for a person to teach us what it means.

Now, when are you going to make the EPA get that advisor on board? When are we going to be privy to the same type of advice that you people are privy to?

We all want to know what something means. You got staff. When we want to know what it means and what it means to people in our community, who do we turn to?

We can't trust the Navy. That goes without saying. We can't trust the people in the Redevelopment Agency. That goes without saying.

And surely the mayor is interested when he is running for reelection.

So what I'm saying, when do we get a break to know what the hell is going on, and why are you circumventing us tonight, having the meeting, knowing that it is going to go before the Board of Directors?

And I have not seen it until tonight. Why? I want to know why are we having this meeting? Are we going to have this meeting tomorrow morning? Is this the same meeting we're going to have tomorrow morning?

LCDR HERON: No, it is not.

MR. WALKER: In other words, none of this is coming up tomorrow?

LCDR HERON: I have not seen the agenda. Do you know what the agenda for tomorrow's RAB meeting is?

FROM THE FLOOR: The agenda for tomorrow's RAB meeting is the proposed plan for

Parcel A.

MR. WALKER: Are we discussing Parcel A tomorrow?

FROM THE FLOOR: The RI/FS, yes.

MR. WALKER: To discuss it tomorrow, I'm saying that this is unfair to us who give of our time; and now you want to have a meeting behind the community's back.

I will do it any way you want to do it, but the community is us. We are the community, and the community looks for Espanola, they look at me and the few of us that come to the meeting, and this is not representative of the people in Bayview-Hunters Point.

This is unfair to them, and it is unfair to us that you're having this meeting tonight, and tell me that you're going to have it tomorrow morning at nine o'clock.

MR. POWELL: We sent over 1,300 notices to people in the community, and all

members of the RAB.

MR. WALKER: I'm not arguing that as much as I'm arguing why did you decide to have this meeting tonight before it went before the Board that the President said that you had to have a RAB Board?

You all put that law in effect. Why are we having this meeting tonight, and it did not come before us first?

And the reason you told me, standing in the back, is because the meeting was canceled last month, because you couldn't get a place to have it.

Now, if we're supposed to see it first and we are on the Board of Directors, then how does it first get to be tomorrow, and you're having a meeting tonight, and the same thing you're going over tonight we're going to go over at nine o'clock tomorrow morning, and if you continue on this path, what direction are we going

on?

Why do we need a Board of Directors if you're going to do things like that? That is all I want to know. The same people who are here now will be here tomorrow morning. The same people for Mr. Wood will be here tomorrow morning; and if you are appealing to the community, then what I want to know is why are we having the meeting tonight?

You know it's not right, and you know we were supposed to have this meeting at this meeting at the last meeting; and all of a sudden, you guys can't wait; and it's not due until the 5th of next month. There was plenty of time to have this meeting after the Board of Directors see it.

That's my point, and we give our time free. You get paid. He gets paid. He gets paid. Black people are here. We got to come to all the stupid meetings; and when we give of ourselves,

you do something like this.

This is unfair; that's my whole point. And what I want to tell you, if we're going to have any of this meeting tomorrow, then let's not have it until tomorrow.

Why would you submit us to this type of undue madness? We're going to have this meeting tomorrow morning at nine o'clock. Why are we here now? What is it that you want to do tonight that we won't be doing tomorrow morning? That's my question. And what can we do about it?

This is the same meeting we're having at nine o'clock in the morning, and these are the same people that are supposed to be there, the same representatives of the community. But the community elected to have certain ones of us on the Board, but we don't have no say-so, because you want to do it now before it comes to the Board.

This is what's wrong with it,

Lieutenant.

LCDR HERON: I understand your comments, Charlie. RAB will have an opportunity to make comments from here until the 5th of September, from here on.

MR. WALKER: If that's the case, why are you having it now?

LCDR HERON: This is the time to kick it off. It will be open until the 5th of September when you give oral or written comments.

MR. WALKER: But we do the same thing tomorrow; we do the same thing tomorrow morning at nine o'clock you are talking about. None of us are prepared this evening. None of us knew all of this was going to do on.

None of us are technically qualified to understand what is in the book. None of us understand on the Board what these charts mean, and we told you all that about 5,000 times. We need somebody on board to help us.

You have sworn you're going to give it to us. It has been two years; we still don't have it. You mean that you can't find nobody to help us in two years?

MR. POWELL: Can I try to respond?

I realize that this meeting is somewhat out of order, based on the fact that we're going to have the RAB meeting tomorrow. When the last RAB meeting got canceled because we couldn't get in this room, it upset the sequence that we had set up to have a RAB meeting, public meeting, in the evening to try to get the folks who can't come to the RAB meeting in the morning, to give them a chance to come out in the evening.

MR. WALKER: Okay, so your sequence -- what you're telling me is your sequence went out, so to hell with the community.

MR. POWELL: This meeting had to be set up about a month ago in order to get the notices in the newspaper, get the plan mailed out

to the 1,300 people that we mailed it to; and so once we had it set up, we were pretty much locked in to tonight.

If you're having trouble with the technical adequacy of these documents, I know I'm from the Navy, you don't trust me; but if you will take my name and phone number, I will be happy to talk to you anytime, come out, sit with you, and go through these documents and try to help your understanding of what we are proposing.

MR. WALKER: Okay, I'll come to get it.

That's not my point, sir. We have been asking for someone like you for the last 18 months. Now you come and tell me you're willing to do it, but it throws your sequence out. I am saying that this mess is supposed to go before the Board of Directors before it makes it to here.

Now, you know and he know and I know, why are you doing it like this? I want to know

what is the rush to do it like this?

MR. POWELL: I think the rush is based on the fact that if we can complete this process that we have underway, to do the investigation, write the reports, have meetings with the community, this parcel will be ready for transfer to the City in very short order.

We want to make sure that parcels are transferred as quickly as we can get them done.

The community needs 90 acres of the buildable land, as I understand it; and we are pushing -- I admit that we are pushing -- but pushing at this point gets that parcel transferred to the City so they can implement a plan.

And when I offered you my name and phone number, I am serious. Call me.

MR. WALKER: Okay, that is understandable.

But what I'm saying to you is, you are all in a rush to transfer this to the City. We

have been arguing with the Navy on the RAB Board how are you going to involve people in this community to be able to economically be involved in that land disposition and everything.

You all won't come to that agreement with us. Every time you all want to do something, you do it in the name of expedience. I am saying there is no reason tonight to have this meeting that we're going to have tomorrow morning at nine o'clock; and since you couldn't get in here last month, what was the necessity to put this meeting before the RAB Board, when it is supposed to be the opposite?

The horse goes before the cart, and you are admitting now that you were supposed to do that, but in the name of expedience, you don't want to do it.

MR. POWELL: I wouldn't say "expedience." I would say the Navy very much wants to transfer some developable land to the

City of San Francisco. Parcel A, which we're discussing tonight and we had hoped to discuss with the RAB a month ago, and you will be able to discuss in the morning, we are right there. It's only a couple of months away that we will have the hazardous waste problem resolved.

Now, there is some other administrative stuff; but this parcel is almost available to the City and the community.

MR. WALKER: But the RAB Board of Directors, sir, was supposed to be able to talk to the Navy and its representatives to be able to effect some meaningful economic development from people in this community. But the Navy has elected to say, "We are not going to deal with you all in the community." The Navy has told the people out here to go to undue expense and go to the CAC Board; and after approving these lands for people in the community, the Navy turned around and said, "We're not going to give it to you; we

have changed our mind."

After the little money that people in this community have, they spent to get accountants to develop their brochures to deliver to the CAC, now you all want to rush to do this when African-American people here are not included.

You are not going to give us 11 acres or 20 acres or 90 acres. We don't have that money. The only thing we can do is get some little parcel. They don't even want to do it for us. This is why they want to have this meeting for tonight, because I have been stuck in the mud in how to get some of our people involved in a meaningful way, to be able to make some money from that shipyard. My father was killed in that shipyard. Other people here and people on this hill are dying from the effects of that yard.

I'm saying to you now, what good is it for you all to have us, and you want to circumvent us? That is wrong, because you knew

that we did it for free. We didn't get paid a dime. You guys are getting paid to do this, but you cannot use our time and then go around us after the President said you had to have us.

What is the necessity? We're going to do it tomorrow morning. Are you going to be here tomorrow morning?

LCDR HERON: I'm not going to be here tomorrow morning. There will be representatives here from the Navy; and in the interest of time --

MR. WALKER: I will not attend this meeting tonight in protest over the fact that you all are taking advantage, and I will make a note to our future mayor of San Francisco that you are having this meeting tonight excluding the RAB Board that you people set up. And I am saying to you that this is no way to treat people in this community.

And I don't know how smug you guys feel about it, or how condescending you look at

it, or how argumentative I may appear, but this is not right. It is not right to have this before we have the meeting tomorrow. Everyone in this room knows it, including Mr. McClelland. He knows it, and you know it.

So I'm saying this is wrong. Why can't we do it tomorrow and postpone this meeting? Why waste our time? I am not going to attend that meeting; however, I will come tomorrow and voice my feelings on the Board of Directors that you all are doing this to us and you know that this is not the way it is supposed to be done, and you have admitted this is not the way it is supposed to be done. So why are you doing it?

LCDR HERON: All right, Charlie, thank you.

Are there any others that have questions on Richard's presentation? If not, we will take a 10-minute break and move into the public comment period.

I again would like to remind you, if you have not filled a card or want to make a comment, please do so. We will be back about 7:20.

(Short recess taken.)

LCDR HERON: Responses to comments will not be given this evening. They will be provided in writing in the Responsiveness Summary with the Record of Decision, which is scheduled to be available on November 30, 1995 and will be included in the City of San Francisco Main Library and Anna Waden Branch Library.

Those who don't wish to provide oral comments may provide written comments. Forms are available in back of the room.

The total number of written comments will be counted, and the names of those submitting comments will be read aloud for the public record.

I would like to start the second part of the meeting. You have heard Richard's overview

of the proposed Parcel A. I would like now to move to the comments part of the meeting. According to what I have been handed, I only have one person who filled out a card; is that correct? It's Christine Shirley from ARC Ecology. Is she still here?

MS. CHRISTINE SHIRLEY: I'm Christine Shirley, representing ARC Ecology.

We have read the RI/FS, and I have a few comments that I would like to put on the record tonight.

The first one is, given the somewhat accidental discovery of the IR-59 JAI site, there are a few statements in the IR/FS that give us some concern, like "numerous small, artifical silt is present on the site as a result of filling, past construction, underground utility installation, and possibly filling ravines and swales." And the statement "relatively small and unmapped silt deposits" is the phrase.

Those give us some concerns, because we wonder what the likelihood is that those unmapped silt deposits are, in fact, contaminated. And I would like to see this addressed somewhere in the RI/FS.

The second comment is that this involves the Work Plan Addendum that is presented in Appendix K, and this addendum was prepared to address Agency and Redevelopment Agency concerns about VOC's in the groundwater around the former underground storage tank at SA-12.

According to this addendum, four groundwater samples were to be taken on each side of the pit, some distance from the pit, to determine the extent of groundwater, possible groundwater contamination.

In fact, only one groundwater sample was collected. The three other borings were dry. And I have a few questions about that sample.

First, I would like to know where it

is. It was not in the RI/FS where that groundwater was drawn from, which of the four borings it was taken from, so I would like to have that addressed.

And I'm wondering if the sampling location that actually had water in it satisfied the San Francisco Redevelopment Agency's concern about groundwater contamination west of the site. They were quite specific about wanting to understand that there is the plume traveling to the west; and since I don't know where the sample was taken, I don't know if that concern was addressed.

And then, based on this one sample, one groundwater sample, the RI/FS concludes that no substantial groundwater contamination was found at that tank site.

And I would need some help understanding how that one sample proves that there is no groundwater contamination as a result

of that underground storage tank, former tank, that has been removed.

That takes care of that small problem.

The RI/FS also does not address adequately the uncertainty associated with the conclusions presented in the RI/FS. I would like to see a little discussion about how adequate the sampling program was statistically to answer the questions that the RI/FS is supposed to answer, which is to describe the contamination at the Parcel A site.

So I would like a little discussion about the uncertainty associated with the sampling and the sampling methodology and also the Risk Assessment part of the RI/FS.

And the fourth issue is, the RI/FS did a weak job of explaining to me, anyway, what the extent of the motor oil contamination is all over the Parcel A site; and I would like to see a

summary in the RI/FS that addresses specifically motor oil contamination on Parcel A.

And then, finally, my fifth point is that lead contamination appears to be a problem at two sites -- SI-43 and SI-41. And I would like to see these areas addressed in the RI/FS, and I would like to know what action the Navy intends to take on those alleged contaminated sites.

I understand that the Investigation by Excavation covered these areas with soil, but in most cases only a couple of feet of clean soil is put over these contaminated areas. And we are concerned that, as the site is developed and graded and rearranged to put buildings on it, that these areas will be exposed to the air, exposure with children and gardens and that sort of thing. They won't remain covered forever, that is the point.

Thank you.

LCDR HERON: Thank you.

Are you going to submit any notes?

MS. SHIRLEY: Yes, we're going to submit written comments. I just wanted to summarize the main points tonight.

LCDR HERON: Thanks very much. We appreciate your concern.

I don't have anyone else, no other sign-up cards for public comment. Is there anybody else who would like to make a public comment? You don't have to fill out a card; you can come up here at this point.

I would like to remind whoever is still here that the written comment is up until the 5th of September, and we will be looking for those comments to incorporate and address those when we get them.

I am a little bit at a loss here, because we're finishing very early.

FROM THE FLOOR: Did somebody answer her questions?

LCDR HERON: We will get back to her on the record. We will have some of that information available to us tonight. At that point, I move to adjourn the meeting. We will stick around for a little while.

FROM THE FLOOR: Excuse me, do you have some written comments? I would like to read them into the record.

LCDR HERON: I stand corrected. After I read the written comments, then we can move to adjourn.

As I understand, we got two written comments submitted. One is from Joyce F. Jones from Palou Avenue, and the comment goes:

"Is there any way to speed up the process? So many issues are to be resolved, and time is of the essence. When???"

Thank you for your comments. We will get back to you on that, and we do look for ways to speed up the process. But we will give you a

better answer than just that.

The second comment is a fax from the California Regional Water Quality Control Board from Richard Hiett. It is rather long. I will go ahead and read it, and we will submit it to the record as well.

It is from the California Regional Water Quality Control Board via fax, and the subject is to the Draft Proposed Plan Hunters Point Annex.

"Dear Mr. Shabahari:

"Regional Board staff have reviewed the aforementioned proposed plan and have the following comments:

"As described in the summary of proposed alternatives, it is unclear if monitoring wells will be abandoned (closed) in both alternatives or only in alternative 2. Both alternatives should properly enclose all monitoring wells that will not

be in service. Further clarification is required. The costs associated with well closing are nominal in comparison to the overall project and should not be the reason for alternative selection. Therefore, the difference in these 'alternatives' appears to be the deed notification.

"Board staff have previously discussed property transfer concerns and deed notification requirements for the residual motor oil pollution in groundwater with Navy staff and their consultants. Board staff concur that, based on the level of effort expended in these investigations and the type of pollutants found, the concentrations of motor oil detected in groundwater within the Parcel A bedrock does not require further investigation, remediation, or groundwater monitoring.

"However, as stated in the draft RI, the groundwater at Parcel A is not well characterized due to the inherent complexities within the bedrock formation. Because of these complexities, Board staff have always maintained that deed notification should be included as part of any no-action alternative for Parcel A. The purpose of a deed notice is to alert potential buyers and developers. It is not intended to thwart development or stigmatize the property.

"Disclosure of past and present environmental problems is part of most, if not all, real estate transactions. HPA is no exception.

"Board staff are available to work with City and Navy staff to draft acceptable language that meets all parties' needs. For further discussion of this

issue, please contact the undersigned at (510)286-4359 or Ms. Shin Roei-Lee at (510)286-0699.

"Sincerely, Richard Hiett, Ground Water and Waste Containment Division."

FROM THE FLOOR: Who is that?

LCDR HERON: The California Regional Water Quality Control Board.

Are there any other oral comments or written comments?

If there is no objection, I would like to move we adjourn this evening's meeting. Technical representatives will hang around for a while. I will be here for a little while, and I would like to thank you all for your participation.

And, again, I would like to remind you that the written comment period is open until September 5th, if you want to get the word out to your neighbors and friends.

MS. JOYCE JONES: The explanation from Mr. Weber was very clear. That was really the most substantive thing I heard so far prior to the meeting, and that is why I had to ask the question "when?" because he did a complete explanation.

MR. WEBER: Thank you.

LCDR HERON: Thank you. Have a good evening.

(Whereupon the hearing adjourned at 7:35 p.m.)

CERTIFICATE OF REPORTER

I, the undersigned, a duly authorized Certified Shorthand Reporter, do hereby certify that the within proceedings were taken down by me in stenotype and thereafter transcribed into typewriting under my direction and supervision, and that this transcript is a true record of the said proceedings.

Paul Gilliam

DEPARTMENT OF THE NAVY
ENGINEERING FIELD ACTIVITY, WEST
NAVAL FACILITIES ENGINEERING COMMAND
900 COMMODORE DRIVE
SAN BRUNO, CALIFORNIA 94066-5006

IN REPLY REFER TO:

5090
Ser 1832.2/L5229
20 Sep 1995

DD 8

From: Commanding Officer, Engineering Field Activity, West, Naval Facilities Engineering Command
To: Distribution

Subj: DRAFT FINAL PARCEL A REMEDIAL INVESTIGATION REPORT, ENGINEERING FIELD ACTIVITY, WEST, NAVAL FACILITIES ENGINEERING COMMAND, HUNTERS POINT ANNEX, SAN FRANCISCO, CALIFORNIA

Encl: (1) Draft Final Parcel A Remedial Investigation Report, Engineering Field Activity, West, Naval Facilities Engineering Command, Hunters Point Annex, San Francisco, California, dtd 22 Sep 1995

1. Enclosure (1) is forwarded in accordance with the Hunters Point Annex Federal Facilities Agreement. If you have any questions regarding this enclosure, please contact Mr. William Radzevich of this Command at (415) 244-2555.

Richard E. Powell
RICHARD E. POWELL
By direction of
the Commanding Officer

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RAB Member: Bay Conservation and Development Commission (Attn: Jeniffer Ruffolo)
RAB Member: Business of Hunters Point Shipyard (Attn: Scott Madison, w/exe. summary only)

5090
Ser 1832.2/L5229
20 Sep 1995

Subj: DRAFT FINAL PARCEL A REMEDIAL INVESTIGATION REPORT, ENGINEERING FIELD ACTIVITY, WEST, NAVAL FACILITIES ENGINEERING COMMAND, HUNTERS POINT ANNEX, SAN FRANCISCO, CALIFORNIA

RAB Member: Mayor's Hunters Point Shipyard Citizens Advisory Committee (Attn: Al Williams)
RAB Member: San Francisco Dept. of Public Works (Attn: Samuel Murray)
RAB Member: SEED (Attn: Sy-Allen Browning)
RAB Member: ARC Ecology (Attn: Saul Bloom)
RAB Member: Law Offices of Leslie R. Katz (Leslie Katz)
RAB Member: Bayview Hunters Point Homeowners Council (Attn: Nicholas S. Agbabiaka)
RAB Member: Carol Bailey
RAB Member: Michael Harris
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Harding Lawson Associates (Attn: Mr. David Leland, w/o encl)

Contract # N62474-88-D-5086

DD 9

DRAFT FINAL PARCEL A REMEDIAL INVESTIGATION REPORT

Department of the Navy
Engineering Field Activity We
Naval Facilities Engineering Com
San Bruno, California 94066-24

COMPREHENSIVE LONG-TERM ENVIRONMENTAL ACTION NAVY (CLEAN I)
Northern and Central California, Nevada, and Utah
CONTRACT Number N62474-88-D-5086

Contract Task Order No. 0142

Prepared For

DEPARTMENT OF THE NAVY
Engineering Field Activity West
Naval Facilities Engineering Command
San Bruno, California

DRAFT FINAL
PARCEL A REMEDIAL INVESTIGATION
HUNTERS POINT ANNEX
SAN FRANCISCO, CALIFORNIA

September 22, 1995

Prepared By

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Or as EPA Records Center document #3033-00394 at the:

U.S. EPA, Region 9
Superfund Records Center
95 Hawthorne St., Suite 403
San Francisco, CA 94105
(415) 536-2000

PUBLIC SUMMARY FOR THE DRAFT FINAL PARCEL A REMEDIAL INVESTIGATION REPORT

DD 10

HUNTERS POINT ANNEX, SAN FRANCISCO, CALIFORNIA

September 22, 1995

As part of the Navy's commitment to clean up its deactivated shipyard at Hunters Point Annex, investigations called site inspections and remedial investigations were conducted at Parcel A. The investigations evaluated potential contamination at the sites within Parcel A. The basic questions addressed by the investigations are where the contamination is located; what is contaminated (soil, groundwater, or air); how much and what types of contamination are present; and who or what could possibly be affected (humans, animals, or plants).

BACKGROUND

Parcel A was established in April 1992 when Hunters Point Annex was divided into five geographic parcels to speed up the transfer of the facility to the City and County of San Francisco. Parcel A consists of approximately 88 acres that cover the entire upland area and a portion of the lowland area at the Hunters Point Annex facility. The upland area was used primarily for residential purposes while the lowland area included office and commercial buildings. Historically, housing has been the dominant land use for Parcel A.

SITE INSPECTIONS

Investigations were conducted at Parcel A to evaluate the nature and extent of contamination in soil. Investigations called site inspections (SI) were conducted at seven sites: SI-19 (building 901) SI-43 (former building 906), SI-41 (buildings 816 and 818), SI-77 (former underground storage tank S-812), SI-45 (steam line system), SI-50 (storm drain and sanitary sewer systems), and SI-51 (transformer sites). The site inspections consisted of the collection and review of available information about the sites; interviews with former users of the sites; site visits: geophysical, radiologic, aerial photograph, and ecological surveys; and the collection of samples. A new method, investigation by excavation, was also used during the site inspections. The following compounds and chemicals were discovered as a result of the soil investigations at the site inspection sites:

- Volatile organic compounds, such as chemicals found in gasoline, were present in the soil left in place at sites SI-41 and SI-43.
- Semivolatile organic compounds, such as chemicals found in diesel, were found in the soil left in place at sites SI-19, SI-41, and SI-43.
- Pesticides and polychlorinated biphenyls were found in the soil left in place at sites SI-19, SI-43, and SI-50.
- Petroleum products, such as motor oil were found in the soil left in place at sites SI-19, SI-41, and SI-43.
- Metals, such as antimony, arsenic, copper, lead, and others were found at sites SI-19, SI-41, and SI-43.

The evaluation of the data collected during the site inspection investigations concluded that all the above mentioned compounds and chemicals in the soils left in place at Parcel A do not pose a significant hazard or risk to human health or the environment.

REMEDIAL INVESTIGATIONS

If the contamination was considered extensive, a remedial investigation was conducted. Remedial investigations were conducted at two sites: one for soil at IR-59 Jerrold Avenue Investigation and one for Parcel A groundwater at IR-59. The remedial investigations consisted of the same methods used in the site inspections with the addition of a new field screening test method for pesticides. The findings of the remedial investigations were as follows:

- At IR-59 Jerrold Avenue Investigation soils containing semivolatile organic compounds, pesticides, petroleum products such as motor oil, and metals were excavated to evaluate the extent of contamination. The extent of pesticide contamination was evaluated using a field screening test method. The soil left in place, after the investigation, does not pose a significant threat to human health or the environment.

- At IR-59 an investigation was conducted to evaluate Parcel A groundwater contamination. The results of the investigation showed low levels of semivolatile organic compounds, motor oil, and metals in the groundwater. Motor oil was found in two small and localized areas: the parking lot spring in front of building 101 and in a single well in Jerrold Avenue. The levels of semivolatile organic compounds and metals detected were below federal and state drinking water standards and are present at concentrations that do not pose a significant threat to human health or the environment.

AIR INVESTIGATIONS

Air sampling investigations were conducted in Parcel A in 1987, 1991, and 1994. All three investigations concluded that exposure risk for future Parcel A occupants was no greater than for existing residents upwind of Hunters Point Annex, and that the levels of compounds and chemicals found are comparable to the levels in the rest of the Bay area.

ECOLOGICAL INVESTIGATIONS

The ecological risk assessment indicated that no special status species, that is threatened or endangered species, inhabit or use Parcel A on a regular basis. Also, because of limited habitat and negligible contaminant levels in the Parcel A soils or groundwater, there is minimal or very low risk to the animal population in Parcel A.

CONCLUSIONS

Based on the findings of the remedial investigation, the Parcel A property may be released for reuse without restrictions to the City of San Francisco.

DD 11

HUNTERS POINT ANNEX
PARCEL A
RECORD OF DECISION

(Pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act)

November 16, 1995

U.S. Department of the Navy
Engineering Field Activity West
Naval Facilities Engineering Command
San Bruno, California 94066-2402

HUNTERS POINT ANNEX

PARCEL A

RECORD OF DECISION

(Pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act)

November 16, 1995

U.S. Department of the Navy,
Engineering Field Activity West,
Naval Facilities Engineering Command

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(415) 715-4100

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Superfund Records Center
95 Hawthorne St., Suite 403
San Francisco, CA 94105
(415) 536-2000

Comprehensive Long-Term Environmental Action Navy (CLEAN)

DD 12

HUNTERS POINT SHIPYARD
SAN FRANCISCO, CALIFORNIA
DRAFT FINAL UPDATED COMMUNITY RELATIONS PLAN

May 1996

Department of the Navy
Western Division
Naval Facilities Engineering Command
Engineering Field Activity West
San Bruno, California 94066-2402

COMPREHENSIVE LONG-TERM ENVIRONMENTAL ACTION NAVY (CLEAN I)
Northern and Central California, Nevada, and Utah
CONTRACT No. N62474-88-D-5086
Contract Task Order No. 310

Prepared For

DEPARTMENT OF THE NAVY
Richard E. Powell, Lead Remedial Project Manager
David Song, Engineer-in-Charge
Engineering Field Activity West
Naval Facilities Engineering Command
San Bruno, California

HUNTERS POINT SHIPYARD
SAN FRANCISCO, CALIFORNIA
DRAFT FINAL UPDATED COMMUNITY RELATIONS PLAN

May 1996

Prepared by

PRC ENVIRONMENTAL MANAGEMENT, INC.
135 Main Street, Suite 1800
San Francisco, California 94105
(415) 543-4880

James M. Sickles, Project Manager

NOTE:

Words and terms presented in bold in the text of this community relations plan are defined in the glossary, which follows the references at the end of the document.

All abbreviations and acronyms used in the text of this community relations plan are included in the abbreviations and acronyms list at the front of the document.

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95 Hawthorne St., Suite 403
San Francisco, CA 94105
(415) 536-2000

COMPREHENSIVE LONG-TERM ENVIRONMENTAL ACTION NAVY (CLEAN I)
Northern and Central California, Nevada, and Utah
CONTRACT No. N62474-88-D-5086
Contract Task Order No. 310 DO 13

Prepared For

DEPARTMENT OF THE NAVY
Richard E. Powell, Lead Remedial Project Manager
David Song, Engineer-in-Charge
Engineering Field Activity West
Naval Facilities Engineering Command
San Bruno, California

HUNTERS POINT SHIPYARD
SAN FRANCISCO, CALIFORNIA
DRAFT FINAL UPDATED COMMUNITY RELATIONS PLAN

December 1996

Prepared by

PRC ENVIRONMENTAL MANAGEMENT, INC.
135 Main Street, Suite 1800
San Francisco, California 94105
(415) 543-4880

James M. Sickles

James M. Sickles, Project Manager

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DD 14

PARCEL A
SUPPLEMENTAL SOIL LEAD SAMPLING
HUNTERS POINT SHIPYARD
SAN FRANCISCO, CALIFORNIA

SUMMARY REPORT
PARCEL A
SUPPLEMENTAL SOIL LEAD SAMPLING
HUNTERS POINT SHIPYARD
SAN FRANCISCO, CALIFORNIA

CONTRACT NO. N62474-93-D-2151
DELIVERY ORDER NO. 111

Submitted to:

Department of the Navy
Engineering Field Activity West
900 Commodore Drive
San Bruno, California 94066-2402

Submitted by:

IT Corporation
4585 Pacheco Boulevard
Martinez, California 94553

March 10, 1998

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Cal/EPA

Department of
Toxic Substances
Control

700 Heinz Avenue,
Bldg. F, Suite 200
Berkeley, CA
94710

Pete Wilson
Governor

Peter M. Rooney
Secretary for
Environmental
Protection

June 26, 1998

Mr. Dennis Mishek
Section Leader
San Francisco Bay Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, California 94612

DD 15

NOTIFICATION OF PETROLEUM CONTAMINATION AT PARCEL A, HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA

Dear Mr. Mishek:

The Record of Decision (ROD) for environmental cleanup at Parcel A at Hunters Point Shipyard stated that no contaminants exist at Parcel A above health-based levels except petroleum products. The ROD indicated that the deed for Parcel A would be annotated to notify future owners of the presence of petroleum contamination. As you know, the Department of Toxic Substances Control's (DTSC) authority does not include oversight of petroleum contamination. Because all other actions required under the National Contigency Plan have been complete, DTSC concludes that our responsibilities at Parcel A have been met.

Because the Regional Board has regulatory authority over petroleum contamination, it will be in the Regional Board's purview to approve the deed notification. We have enclosed some suggestions as to the content of the the notification.

If you have any questions, please call me at (510)540-3772.

Sincerely,

Daniel E. Murphy, P.E.
Unit Chief
Office of Military Facilities

enclosure

cc: Ms. Claire Trombadore (SFD-8-2)
U. S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, California 94105-3901

Mr. David Leland
California Regional Water Quality Control Board
San Francisco Bay Region
2101 Webster Street, Suite 500
Oakland, California 94612

Ms. Amy Brownell
San Francisco Department of Public Health
1390 Market Street, Suite 910
San Francisco, California 94102

Commanding Officer
Engineering Field Activity, West
Naval Facilities Engineering Command
Attn: Mr. Michael McClelland, Code 1832
900 Commodore Drive
San Bruno, California 94066-2402

SUGGESTED ITEMS FOR PARCEL A DEED NOTIFICATIONS

Following are points that would helpnotify owners of the presence of petroleum contamination at Parcel A.

- presence of minimal petroleum contamination
- no action taken because the source is unknown and the contamination is at low concentrations

most areas overlying contamination the are paved

future land users should be aware of this contamination and should consider it when planning the land use.

June 30, 1998

DD 16

Cal/EPA

Department of
Toxic Substances
Control

700 Heinz Avenue
Suite 200
Berkeley, California
94710-2737

Pete Wilson
Governor

Peter M. Rooney
Secretary for
Environmental
Protection

Commanding Officer
Engineering Field Activity, West
Naval Facilities Engineering Command
Attn: Mr. Michael McClelland, Code 1832
900 Commodore Drive
San Bruno, California 94066-2402

CERTIFICATION OF REMEDIAL ACTIONS AT PARCEL A, HUNTERS POINT NAVAL SHIPYARD

Dear Mr McClelland:

The purpose of this letter is to advise you of the Department of Toxic Substances Control's (DTSC) determination of completion of remedial actions at Parcel A, Hunters Point Naval Shipyard. Pursuant to the State process for oversight of response to hazardous substance release, DTSC certifies that the Record of Decision (ROD) dated November 16, 1995, for Parcel A has been implemented. Further, DTSC has reviewed the ROD dated November 16, 1995, and subsequent records at the site, and we have concluded that remedial actions required pursuant to the National Oil Spill Contingency Plan (NCP), as contained in the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), and as identified in the ROD, have been completed. This determination is based in part on information available at the time of preparation and concurrence with the ROD. We note that the ROD identified no further remedial actions pursuant to CERCLA to be taken. We also note that non-CERCLA petroleum releases or potential releases to groundwater were noted in the ROD, with the suggestion that a notice to that effect be included in the deed when developed. We have requested that the Regional Water Quality Control Board, as the agency responsible for protection of the waters of the state, pursue the notice with the Navy and the City of San Francisco.

If you have any questions, please contact Ms. Valerie Heusinkveld at (510) 540-3941.

Sincerely,

for Anthony J. Landis, P.E.
Chief, Northern California Operations
Office of Military Facilities

cc: see next page

cc: Ms. Claire Trombadore (SFD-8-2)
U. S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, California 94105-3901

Mr. David Leland
California Regional Water Quality Control Board
San Francisco Bay Region
2101 Webster Street, Suite 500
Oakland, California 94612

Ms. Amy Brownell
San Francisco Department of Public Health
1390 Market Street, Suite 910
San Francisco, California 94102

HUNTERS POINT SHIPYARD
RESTORATION ADVISORY BOARD
Wednesday, August 26, 1998

DD 17

DRAFT MEETING MINUTES

LOCATION: San Francisco City College
2nd Floor Lounge
1400 Evans Avenue
San Francisco, CA

PURPOSE: To provide: (1) the Community Co-chair report, (2) information on the removal of Parcel A from the National Priorities List (NPL), (3) answers to concerns regarding the human health risk assessment, (4) continued discussion on the draft final Parcel C Feasibility Study, (5) and recommendations for the next RAB meeting agenda.

These minutes summarize the items discussed during the RAB meeting; they are not a verbatim transcript. Attachment A provides the attendance list, Attachment B provides the meeting agenda and Attachment C provides the presentation handout materials.

FACILITATOR: Ryan Brooks, EFA West

I. Call to Order and Announcements

Ryan Brooks opened the meeting at 6:10 p.m. noting he would be facilitating the meeting in Doug Kern's absence. There were no proposed changes to the agenda.

Mike McClelland, BRAC Environmental Coordinator and Navy Co-Chair, made the following announcements:

- comments are due on August 31 for the Parcel C draft final Feasibility Study (FS)
- all comments have been received on the draft work plan and field sampling plan for the Parcel E Validation Study; field sampling will begin in early September.

Ray Thompkins asked that Item 4 on the agenda, the Human Health Risk Assessment discussion, be moved up on the agenda. It was agreed that this item would follow the Community Co-Chair report.

II. Community Co-Chair Report

Jill Fox urged the Navy to place signs on the trucks involved in the Parcel B soil removal to distinguish them from other trucks working at the Ferrari site outside the HPS gate. She stated that there have been problems associated with the trucks from the Ferrari site (driving off the site uncovered, working on weekends and late at night, and using neighborhood streets). Clearly marked trucks will help protect the Navy from community complaints and help the community direct complaints to the right source. Mr. Brooks confirmed that all trucks involved in the Navy's soil removal activities are marked with a white bumper sticker with a contact number on it. He added that each truck is checked before leaving the gate to ensure it has a sticker.

Dorothy Peterson asked if information regarding the trucks carrying bumper stickers was provided to the community. Mr. Brooks stated that the information went out in several ways - he went door-to-door to speak with people along Ennis Street, a fact sheet was mailed out to the Hunters Point community, a meeting was held for tenants of HPS, and an information table was set up at Zack's Rocket Café during the first week of the cleanup. Mr. Brooks noted that an update on the cleanup will go out in the next PAC mailing, as well.

Ms. Peterson stated the importance of being able to identify the Navy trucks because some other trucks are using routes through the neighborhood such as Ingles and Hudson Streets. Mr. McClelland noted that shipyard trucks are requiredare required to travel only a certain route out of Hunters Point; the route is outlined in the flyer.

Ms. Peterson expressed concern that information is not being provided to community members who are challenged by the printed word, and that the Navy needs to be more proactive in notifying the community of cleanup activities. She offered her assistance in getting the information out to the community. Erlinda Villa suggested bringing flyers to the local churches. Ms. Peterson advised the Navy to contact residents up the hill in addition to along the main roads through town. Amy Brownell, City of San Francisco, suggested that an information table be set up at Zack's Rocket Café again.

Ms. Peterson stated that the members of the Muwekma Ohlone tribe are getting more information that the shipyard is their land. She noted that it mainly effects affects reuse, but also has implications on the cleanup because they are requesting that cleanup be conducted to residential standards. Ms. Fox added that the tribe is challenging the City for ownership of the land, which may eventually affect cleanup. Mr. Brooks offered to meet with Ms. Peterson next week to further discuss the concern.

III. Human Health Risk Assessment

Mr. McClelland introduced Dr. Dan Stralka, a toxicologist with U.S. EPA, who came to answer questions raised about human health risk assessment at earlier RAB meetings.

Dr. Stralka noted one concern regarding the partial volatilization of DDT and daughter products during removal actions at Parcel F and their effect on the community. Dr. Stralka stated that this concern has already been taken into account in the calculations for the preliminary remediation goals (PRGs). Vapor pressure for DDT and DDE are relatively low, however the calculations take into account inhalation exposure from windblown dust. This pathway becomes a possible complete exposure route, and is calculated in the PRG tables whichtables, which are used for screening sites.

Dr. Stralka explained that PRGs look at all the different pathways of exposure (airborne, in soil, in groundwater) how a person could be exposed to a chemical, and how the physical property will be used and potential exposure. The pathways of exposure are calculated to determine a level of concern for a chemical contributing to the pathways. He noted that dust exposure was taken into account in the calculations.

Mr. Thompkins asked if the tables are calculated by traditional EPA standards using high dose single exposure, or from low level cumulative effects. He pointed out concern regarding the high level of breast cancer being detected in young, African-American women from the local community. He noted particular concern with high DDT levels associated with Yosemite Slough and the link between DDT and breast cancer. Mr. Thompkins added that past practices have based risk assessments on 50 year old50-year-old white males in an industrial scenario, and don't reflect the situation at Hunters Point.

Mr. Stralka responded that the studies for DDT are from a higher dose, but are being extrapolated down to a zero dose. He added that there are a number of safety factors in extrapolating from animals to humans because there is no human data. The toxicity information uses animal data but is extrapolated to low dose levels. Recent scientific information regarding estrogenic-like compounds are not taken into consideration, but EPA has conducted several workshops on how to perform tests and what would be appropriate tests to determine these endpoints. As the data becomes available it will be incorporated into the toxicity levels and ultimately into PRG data.

Mr. Thompkins asked if genetic variances are taken into account in calculating risk, noting that the Hunters Point community is diverse and multi-cultural. He added that trends and ethnicity should be considered in the community rather than using a national standard. Dr. Stralka responded that when EPA derives toxicity values and reaches a point of uncertainty of population variability, the assessments are designed to err on the side of safety. In addition, in extrapolation from animals to humans, a factor of ten is added to the calculations to take into account population variability.

Mr. Tompkins stated that something is acutely wrong in the community given the health effects being observed in the local population. He noted that new data needs to be considered in risk calculationscalculations, as it becomes available. He added that synergistic effects also need to be considered.

Mr. Brooks asked if the windblown soil is affecting the local community. Dr. Stralka stated that this exposure is being taken into account in the PRG tables. He explained that the calculations look at

human exposure pathways on the shipyard; higher levels of exposure would be expected on the shipyard than in the community due to closer proximity to the source. Multiple chemical exposure is taken into account by adding the risks together.

Mr. Thompkins noted that the shipyard is not an isolated point, but that chemicals from the shipyard may be mixing in the neighborhood. He advocated that a realistic table be developed based on what is in the neighborhood, and what is coming off the shipyard as well as from other industry and mixing in the neighborhood.

Ms. Peterson asked why fish were not tested since people consume fish from the Bay. Dr. Stralka noted that there is a Bay-wide fish advisory, primarily due to concern about PCBs, but which also includes DDT. Mr. Thompkins noted that the fish advisory warning signs are not large enough for people to take heed.

Marie Harrison questioned further concerns about chemical exposure from windblown dust, noting health problems associated with her grandchildren when they are in the neighborhood. Charles James Heagy suggested that the problems may be from allergies, noting an especially high level of allergens due to a long rainy season.

A member of the audience asked why the PRGs were not calculated taking into account synergistic effects, and why the effects are added rather than multiplied since there are so many different chemicals on site. Dr. Stralka replied that EPA has tried to streamline the calculations to provide a frame of reference. He pointed out that the data is not available to evaluate the synergistic or antagonistic effects of chemicals and that synergy has not yet been demonstrated through research.

Ms. Fox asked whether there was any attempt to assess the actual nearby population when the human health risks were calculated for the parcels. Dr. Stralka noted that the Agency for Toxic Substances and Disease Registry (ASTDR) looked at the local population. Mr. McClelland added that ASTDR issued a report in November 1994 on the health risks to the community which may have been associated with the shipyard. Dr. Stralka noted that the cleanup involves looking at what the current situation is and what it will be in the future; ASTDR looks at whether there was a problem before the cleanup and whether cases of disease can be associated with the problem. Mr. McClelland noted that ASTDR has an office in San Francisco.

Mr. Thompkins stressed that the assessment was performed only on the HPS property and did not take into account what is in the community. He noted that the calculations are not a realistic reflection of the community and asked if it is possible for a recalculation based on the community outside of the shipyard. Dr. Stralka replied that it is complicated to try to take everything into account outside of the shipyard, noting that the best way to calculate risk is to look at human exposure on HPS, where the exposure would be highest. He added that the calculations look at chronic exposure and consider genetic variation by adding in a factor of ten.

Ms. Peterson asked again why fish are not being tested. Dr. Stralka stated that the EPA has

requested that the Navy include analysis of the fish consumption pathway. The Navy has responded that the Fish and Wildlife Service is already sampling the fish which has resulted in the Bay advisory. The Navy has also argued that it is hard to distinguish fish at Hunters Point because fish are a highly mobile species and may travel all around the Bay.

Ms. Fox asked about smaller marine animals such as mussels and shrimp that don't move around the Bay like fish do. Dr. Stralka acknowledged that EPA has also asked that the Navy sample these species. The Navy's response is that data is also being collected Bay-wide for these organisms. He noted that it is a regional concern and that the Bay is being monitored. There is a fish advisory in particular because of the types of chemicals and concentrations bio-accumulating in fish.

Ms. Peterson asked what the RAB can do. Dr. Stralka commented that evaluation of the endpoints areevaluation of the endpoints is being driven by the ecological risks. If there is no effect on the organisms in the sediments or on the fish, then the effect on the rest of the food chain is minimized. Ms. Peterson requested that the issue be revisited at a later date and to also let the RAB know if there's anything they can do regarding the concern.

IV. Removal of Parcel A from the National Priorities List (NPL)

Sheryl Lauth, U.S. EPA, discussed a proposal to remove Parcel A from the NPL. She explained that the NPL is a list put together by EPA containing the highest priority sites in the country to help focus cleanup activities. All of HPS is currently on the NPL; Parcel A is being proposed for removal but Parcels B-F would remain. She distributed copies of an EPA letter to Byron Rhett of the San Francisco Redevelopment Agency, detailing CERCLA liability issues involving transfers of federally owned property.

Ms. Lauth stated that the city of San Francisco requested that Parcel A be delisted to help market the site to developers. No cleanup is required on Parcel A so it is a good candidate for delisting. Delisting follows the process of publishing a Notice of Intention to Delete in the Federal Register, following a 30-day state approval process. A 30-day comment period comes after the notice is published. She noted that community input before the process begins would be helpful.

Ms. Lauth stated that a tentative schedule allows for public comment to run from October 20 to November 20; RAB members will be informed of when this comment period begins. Ms. Lauth introduced Jeremy Bricker; an intern with EPA, who put together the draft Notice of Intention to Delete.

Ms. Lauth noted that Dr. Stralka would discuss the lead-based paint issue associated with Parcel A. Dr. Stralka explained that a goal of the cleanup program is to eventually remove all of the parcels from the NPL and that Parcel A starts the process. He stated all of the data was reviewed to see if anything was missed. The only issue that came up from this review was the lead-based paint samples taken in the early 90's. Two of the samples - one at the water tower and one near a house - showed elevated lead levels. Both areas were resampled; high lead levels were not found at the

house, and the average concentration of lead in the soil at the water tower at a two inch depth was 300 parts per million (ppm). The PRG screening level used for lead at HPS is 220 ppm. It was determined that 300 ppm of lead in the soil wouldn't pose a problem lowsed based on the low volume of contaminated soil around the water tower. Dr. Stralka added that Housing and Urban Development (HUD) standards for residential areas use 400 ppm as a screening level and look at minimizing exposure at levels between 400 and 2,000 ppm. HUD would not suggest active remediation until levels reach between 2,000 and 5,000 ppm.

Ms. Harrison asked how the lead dissipated from around the house between the two sampling times. Dr. Stralka explained that the high reading of lead from the earlier samples may have been attributed to paint chips collected with the sample. Mr. McClelland added that there was a discrepancy between the levels found from two samples analyzed by different methods; the location was resampled and found to be at an acceptable level, and so the first sample reading was attributed to lab error.

Ms. Harrison asked if it would be expensive to remove the soil from the area. Dr. Stralka responded that it would be hard to justify the funds to remove the soil when the level is below HUD's 400 ppm standard and significantly below their 2,000 ppm standard. Ms. Brownell added that the City is comfortable with the level because most of the samples are below 220 ppm and pointed out that the redevelopment agency will remove the houses and regrade the site whichsite, which should eliminate any remaining problem.

Ms. Peterson asked if the parcel would likely get recontaminated. Dr. Stralka stated that if any contamination is discovered during redevelopment, the Navy must come back and reinvestigate. He added that the situation should be alrightall right within the current systems and controls. Caroline Washington asked where the water tower is located. Dr. Stralka pointed out that it is in the northwest portion of the parcel, elevated above the large concrete building. He added that all of Parcel A has been investigated and is ready for reuse.

V. Continued Discussion on the Draft Final Parcel C FS

Kent Morey, TetraTech EMI, reviewed that all investigation work has been completed at Parcel C. The FS summarizes the information from the investigation and develops remedial technologies. He noted that the area was used primarily for ship maintenance and repair. Soil contamination includes volatile organic compounds (VOCs), heavy metals and PCBs; nearly all of the groundwater contamination is caused by VOCs...

Mr. Morey explained that the FS develops goals to achieve in the cleanup. There are two remedial action goals for groundwater:

" identify the migration of contaminants through the soil and groundwater and into the Bay migration does not appear to be happening yet)

" protect human health from volatiles in the air - concentrations in groundwater may enter buildings and be breathed by people inside, completing an exposure pathway
" Specific cleanup technologies would focus on either preventing contaminants from reaching the Bay or from reaching breathing space. He indicated on a map the locations of the contaminated areas.

Charles Dacus noted that the HPS cleanup scorecard indicates the FS is in progress through Fall 1998. Mr. Morey stated that the comment period will close at the end of the month, at which point a response to comments will be provided. A draft Proposed Plan will follow, which also includes a public comment period, then a technology will be chosen.

Mr. Morey briefly reviewed some of the items on a handout (refer to Attachment C) providing the definitions of groundwater remedial alternatives and soil remedial alternatives.

Soil Remedial Alternatives

Soil Vapor Extraction (SVE): Pipes with holes are sunk into the ground; a vacuum on the end of the pipe draws air and the chemicals from the soil through the pipes like a straw. The air containing the chemicals is collected and the chemicals separated out to a container for treatment.

Solidification and Stabilization (S/S): This: This technology is used to treat heavy metals, not VOCs. The contaminated soil is mixed with a material that binds the soil and contaminants together to form a solid, concrete-like mass.

Thermal Desorption: Contaminated soil is heated to separate chemicals from the soil and move them into the air. The air containing the chemicals is them then moved to another container for treatment.

Groundwater Remedial Alternatives

Mr. MooreyMorey noted that some of the technologies work better for some sites than others, depending on the specific situation.

Excavation of Saturated Affected Soil: Contaminated soils are dug up and removed. Sides of the excavation may need to be shored up with sheet piling. This technology is best used for small, isolated sites.

Groundwater Extraction, On-Site Treatment and Discharge to POTW: Extraction wells remove groundwater whichgroundwater, which is them then pumped on an on-site location for treatment. The treated water is them discharged to the local publicly owned treatment works (POTW). This technology works well for larger areas.

Ms. Brownell noted that the Navy will have to obtain a permit from the City in order to discharge the treated water into the POTW. Mr. MooreyMorey noted that some chemicals may stick to the soil and require further action. Six-phase soil heating can be used to augment the removal of chemicals remaining in the soil.

Six-Phase Soil Heating: Electrodes are placed in the ground surrounding the affected area which heat up the soil when a voltage is applied. Steam created underground by the electrical current separates VOCs from the soil. The VOCs must be removed from the steam through another process. This is considered an emerging technology.

Additional technologies are noted in the handout, Attachment C.

Mr. McClelland Noted that a Proposed Plan, identifying a treatment technology, will be developed after the final FS. A 30-day review and comment period and a public comment meeting will follow. ; Aa Record of Decision (ROD) will be issued to complete the process.

IV. Agenda Items

The following items were identified as topics for the September meeting:

- tour of Parcel B cleanup
- further questions on the NPL
- Public Utilities Commission (PUC) presentation on Yosemite Creek

Mr. Brooks adjourned the meeting at 8:02 p.m.

Mr. Brooks adjourned the meeting at 8:02 p.m.

The next regular RAB meeting will be held on Wednesday, September 23, 1998, at the San Francisco City College, 6:00 p.m.

ATTACHMENT A

MEETING AGENDA

AGENDA
HUNTERS POINT SHIPYARD
RESTORATION ADVISORY BOARD

DATE: August 26, 1998

LOCATION: SF City College
2nd Floor
1400 Evans Avenue
San Francisco

6:00	1.	Call to Order and Announcements (Upcoming Documents and Activities)
6:05	2.	Community Co-chair Report (An opportunity for the community Co-chairs to discuss information of interest to the RAB)
6:15	3.	Removal of Parcel A from the National Priorities List (NPL) (EPA will make a presentation and lead a discussion on the delisting of Parcel A from the NPL)
6:35	4.	Human Health Risk Assessment (Dr. Dan Stralka, a Toxicologist for the U.S.EPA, will talk with us about human health risk assessments for the cleanup and answer questions on the effects of some contaminants being cleaned up at HPS)
7:00	5.	Continued Discussion on the Draft Final Parcel C Feasibility Study (We will continue the discussion of the Draft Final Parcel C FS)
7:45	6.	Recommendations for Agenda Items for next RAB meeting and future field trips/activities
7:55	7.	Adjourn

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

DD 18

September 24, 1998

Anthony Landis
Cal/EPA DTSC
Office of Military Facilities
10151 Croydon Way, Suite 3
Sacramento, CA 95827-2106

Re: Request for DTSC concurrence on the decision to delete Parcel A of Hunters Point Shipyard from the National Priorities List.

Dear Mr. Landis:

I respectfully request the concurrence of the Cal/EPA Department of Toxic Substances Control, on behalf of the State of California, on the deletion of Parcel A of the Hunters Point Shipyard Superfund Site (HPS) from the National Priorities List (NPL). Enclosed for your review is a draft copy of the "Notice of Intention for Partial Deletion" (NOID) of Parcel A of HPS from the NPL. After concurrence, the NOID will be published in the Federal Register.

We are moving forward with this partial deletion at the request of the City of San Francisco (City) because they believe it will facilitate future development of Parcel A. As you know, the Navy issued a "no action" Record of Decision (ROD) for Parcel A in 1995. The boundary of this partial deletion is the same as the Parcel A boundary shown in Figure 3 of the ROD, except that Crisp Avenue will not be included in Parcel A. Crisp Avenue will be included in Parcel E. In addition the Parcel A boundary along Spear Avenue was extended to the other side of the road, where it borders Parcel D, to accommodate the City's request that this road be included in the partial deletion. To support the decision to move the boundary from one side of Spear Avenue to the other, EPA reviewed the remedial investigation data and confirmed that Spear Avenue does not contain any installation restoration (IR) sites.

EPA is required to provide the State with 30 days for review of the NOID. However, in order to meet the needs of the City, it would be greatly appreciated if you could respond to me with a letter, stating your concurrence, as soon as possible.

If you have any questions concerning the proposed partial deletion of the Site, please contact me at 415/744-2420 or Tom Huetteman at 415/744-2384. Thank you very much for your attention to this matter.

Sincerely,

Daniel D. Opalski
Chief, Federal Facilities Cleanup Branch

Enclosure

cc: Dan Murphy, DTSC
Tom Huetteman, EPA

DRAFT

40 CFR PART 300

National Oil and Hazardous Substances Pollution Contingency Plan

National Priorities List

AGENCY: Environmental Protection Agency

ACTION: Notice of intent for partial deletion of the Treasure Island Naval Station - Hunters Point Annex Site from the National Priorities List (NPL).

SUMMARY: The Environmental Protection Agency (EPA), Region 9, announces its intent to delete operable unit (OU) No. 1, also known as Parcel A, of Treasure Island Naval Station - Hunters Point Annex, also known as Hunters Point Naval Shipyard (HPS), Superfund Site (EPA ID # CA1170090087) from the National Priorities List (NPL) and requests public comment on this action. The NPL constitutes Appendix B to the National Oil and Hazardous Substance Pollution Contingency Plan (NCP), 40 CFR part 300, which EPA promulgated pursuant to section 105 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

This proposal for partial deletion pertains to Parcel A, which includes the upland area of HPS and a portion of the lowlands. A majority of Parcel A had functioned as a residential area for Navy personnel and is designated, by the City of San Francisco Redevelopment Agency, for future residential use. The Navy has issued a ▒no action▒ Record of Decision (ROD) for Parcel A. EPA bases its proposal to delete Parcel A on the

determination by EPA and the State of California, through the California Environmental Protection Agency (Cal/EPA), Department of Toxic Substances Control (DTSC), that all appropriate actions under CERCLA have been implemented to protect human health, welfare, and the environment at Parcel A.

This partial deletion pertains only to Parcel A of the HPS Site and does not include Parcels B, C, D, E, and F. Parcels B, C, D, E, and F will remain on the NPL, and response activities will continue at these parcels.

DATES: Comments concerning this site may be submitted on or before **[insert date 30 days from publication date]**.

ADDRESSES: Comments may be submitted to Carolyn J. Douglas (SFD-5), NPL Coordinator, U.S. EPA, Region 9, 75 Hawthorne St., San Francisco, CA 94105, 415-744-2343, Fax 415-744-1916, email DOUGLAS.CAROLYN@EPAMAIL.EPA.GOV.

INFORMATION REPOSITORIES: Comprehensive information on this Site is available for viewing at the following locations:

U.S. EPA, Region 9, Superfund Records Center, 4th floor, 95 Hawthorne St., San Francisco, CA 94105, 415-536-2000.

Anna E. Waden Branch Library, 5075 Third St., San Francisco, CA 94124, 415-715-4100.

San Francisco Main Public Library, Civic Center, San Francisco, CA 94102, 415-557-4400.

FOR FURTHER INFORMATION CONTACT: Claire Trombadore (SFD-8-2), RPM, U.S. EPA, Region 9, 75 Hawthorne St., San Francisco, CA

94105, 415-744-2409, Fax 415-744-1916, email TROMBADORE.CLAIRE@EPAMAIL.EPA.GOV.

SUPPLEMENTARY INFORMATION:

Table of Contents

I. Introduction

The United States Environmental Protection Agency (EPA), Region 9, announces its intent to delete a portion of the Treasure Island Naval Station - Hunters Point Annex, also known as Hunters Point Naval Shipyard (HPS), Site located in San Francisco, California, from the National Priorities List (NPL), which constitutes Appendix B of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR part 300, and requests public comment on this proposal.

This proposal for partial deletion pertains to Parcel A, which consists of the upland area, as well as a portion of the lowlands, of HPS. Parcel A is bounded by the other portions of HPS and the Bayview-Hunters Point district of San Francisco. Parcel A boundaries extend up to Crisp St. and across Spear Ave. to the south, up to Griffith St. to the west, and up to Fisher Ave. and across Robinson St. and Galvez Ave. to the east. On the north, the Bayview-Hunters Point district of San Francisco is

delineated from HPS by a fence. A figure and the exact coordinates that define the deleted property at the Site are contained in the NPL Deletion Docket.

Section II of this document explains the criteria for partially deleting portions of a site from the NPL. Section III discusses the procedures that EPA is using for this action. Section IV discusses the HPS Site and explains how partial deletion criteria are met for this Site.

II. NPL Deletion Criteria

Section 300.425(e) of the NCP provides that releases may be deleted from, or recategorized on, the NPL where no further response is appropriate. In making a determination to delete a release from the NPL, EPA shall consider, in consultation with the state, whether any of the following criteria have been met:

(i) Responsible parties or other parties have implemented all appropriate response actions required;

(ii) All appropriate Fund-financed response under CERCLA has been implemented, and no further action by responsible parties is appropriate; or

(iii) The remedial investigation has shown that the release poses no significant threat to public health or the environment and, therefore, taking of remedial measures is not appropriate.

Site releases may not be deleted from the NPL until the state in which the site is located has concurred with the proposed deletion. EPA is required to provide the state with 30 working days for review of the deletion notice prior to its

publication in the **Federal Register**.

As described in 40 CFR 300.425(e)(3) of the NCP, sites deleted from the NPL are eligible for further remedial action should future conditions warrant such action. If new information becomes available which indicates the need for further action, EPA may initiate remedial actions. Whenever there is a significant release from a site deleted from the NPL, the site may be restored to the NPL without the application of the Hazard Ranking System.

III. Deletion Procedures

The following procedures were used for the intended partial deletion of this site: (1) All appropriate response under CERCLA has been implemented and no further EPA response is appropriate; (2) the State of California has concurred with the partial deletion; (3) a notice has been published in the local newspapers and has been distributed to the appropriate Federal, State and local officials and other interested parties announcing the commencement of the 30-day public comment period on EPA's Notice of Intent to Delete; and (4) all relevant documents have been made available in the local site information repositories.

Deletion from the NPL does not itself create, alter, or revoke any individual's rights or obligations. As mentioned in Section II of this notice, Section 300.425(e)(3) of the NCP states that the deletion of a site from the NPL does not preclude eligibility for future response actions.

EPA's Region 9 office will accept and evaluate public

comments on EPA's Notice of Intent to Delete before making a final decision to delete the specified parcel. If necessary, Region 9 will prepare a Responsiveness Summary to address any significant public comments received.

If EPA determines, with the State's concurrence, that the partial deletion is appropriate after consideration of public comment, then EPA will place a final Notice for Partial Deletion in the **Federal Register**, completing the process. Public notices and copies of the Responsiveness Summary, if necessary, will be available in the site repositories.

IV. Basis for Intended Partial Site Deletion

The following summary provides EPA's rationale for the proposed deletion of Parcel A of the HPS Site from the NPL.

Site Description

HPS is located on a promontory in southeastern San Francisco. The promontory is bounded on the north, east, and south by San Francisco Bay and on the west by the Bayview-Hunters Point district of the City of San Francisco. The entire HPS covers 936 acres, 493 of which are on land and 443 of which are under water. To facilitate the environmental investigation and remediation and ultimate transfer of the property to the City of San Francisco, HPS was divided into several parcels (Parcels A through F).

Parcel A, consisting of the upland areas of HPS and a

fraction of the lowlands, is bounded by the other portions of HPS and the Bayview-Hunters Point district and covers approximately 88 acres. Land to the northwest of Parcel A is used for residential purposes. The other HPS parcels that bound Parcel A are currently undergoing investigation and remediation for future redevelopment. Under the City of San Francisco Redevelopment Agency's current land-use plan, those parcels will ultimately be used primarily for commercial and industrial purposes, whereas Parcel A will be used for residential as well as for light commercial purposes.

No wetlands or surface waters are located at Parcel A. Limited quantities of groundwater are present in localized fractures of the bedrock (which, along with localized areas in which it is covered by fill, underlies all of Parcel A). Parcel A groundwater is not considered suitable as a potential source of drinking water because of low well yield.

No underground storage tanks (UST), aboveground tanks (AST), drums, or hazardous materials storage areas remain on Parcel A. Sewer lines, storm drains, and steam lines located in Parcel A were also included in the early investigations, but no further action was required for these utilities.

Site History

Hunters Point was first developed for dry dock use in 1867. The Navy acquired title to the land in 1940 and began developing the area for various shipyard activities. In 1942, the Navy

began using HPS for shipbuilding, repair, and maintenance. From 1945 to 1974, the shipyard was primarily used as a repair facility by the Navy. The Navy discontinued activities at HPS in 1974. From 1976 to 1986, the Navy leased 98 percent of HPS, including all of Parcel A, to the Triple A Machine Shop Company (Triple A), a private ship repair company. In 1986, the Navy reoccupied the property. Currently, portions of Parcel A are subleased for use as artists' studios.

Throughout its history, Parcel A was used by both the Navy and Triple A for primarily residential purposes. In addition, the Navy used one building for the National Radiation Defense Laboratory Program. Most of the other structures were used as offices and warehouses.

Site Investigation Activities

The Navy began environmental studies at HPS in 1984 under the U.S. Department of Defense (DOD) Installation Restoration Program. Between 1984 and 1991, the Navy performed a series of investigations, both installation-wide and specific to Parcel A, to identify potential source areas of contamination and to investigate air quality.

In 1989, EPA added HPS to the NPL due to the presence of hazardous materials from past shipyard operations (proposed in 54 FR 29820, and final in 54 FR 48184). In 1990, the Navy, EPA, and the State of California entered into a Federal Facilities Agreement (FFA) to coordinate environmental activities at HPS.

In 1991, the DOD designated HPS for closure as an active military base under its Base Realignment and Closure (BRAC) program.

The Navy carried out a preliminary assessment/site inspection (PA/SI) of potential source areas on Parcel A that had been identified during the Navy's previous investigations. Soils at some sites contained semivolatile organic compounds (SVOC), pesticides, polychlorinated biphenyls (PCB), total petroleum hydrocarbons (TPH), metals, volatile organic compounds (VOC), and herbicides. In the process of conducting the Remedial Investigation (RI), contaminated soils in these limited areas were excavated, disposed of off-site, and replaced with clean soil. At the completion of the RI, the Navy determined that all necessary response actions had been taken for Parcel A soils.

As part of the Parcel A RI, groundwater was also investigated. The RI concluded that the only contamination concern was from motor oil (a form of TPH). Due to low well yield, lack of historical use of Parcel A groundwater, and the nature of this bedrock aquifer, it was concluded that no complete pathway for exposure to Parcel A groundwater exists. Furthermore, motor oil is not specified as a hazardous substance under CERCLA, and the State does not intend to require further action on this release. As requested by the Regional Water Quality Control Board (RWQCB), however, Parcel A will be subject to a deed notification so that future users will be informed that motor oil was detected in groundwater.

In addition to evaluating human health issues, an Ecological

Risk Assessment was conducted. The Ecological Risk Assessment concluded that, due to the limited availability of habitat, the scarcity of potential receptors, and the low level of contaminants detected on Parcel A of HPS, the risks to ecological receptors from Parcel A are minimal.

After the RI, the Navy, EPA, and Cal/EPA concurred that no further action is necessary on Parcel A. The proposed plan for this portion of HPS was released for public comment in August of 1995. After reviewing comments and determining that no significant changes to the preferred remedy were required, the Navy, in concurrence with EPA and Cal/EPA, issued a "no action" Record of Decision (ROD) in November 1995. Since hazardous substances are not present at Parcel A at concentrations above acceptable risk levels, the five year review requirement of CERCLA Section 121(c) is not applicable.

Community Involvement

In the late 1980s, the Navy formed a Technical Review Committee (TRC), consisting of community members and representatives of regulatory agencies, to discuss environmental issues pertaining to HPS. In 1993, pursuant to the Defense Environmental Restoration Program, 10 U.S.C. Section 2705(d), the TRC was replaced by a Restoration Advisory Board (RAB), at which representatives from the Navy, the local community, and regulatory agencies meet monthly to discuss environmental progress at HPS.

The draft RI report and proposed plan for Parcel A were released to the public in the summer of 1995. The proposed plan was mailed to stakeholders involved with HPS. Notice of availability of the proposed plan was published in local newspapers. The Parcel A ROD summarizes comments received during the subsequent public meeting and 30 day public comment period. These community participation activities fulfill the requirements of Section 113(k)(2)(B)(i-v) and Section 117(a)(2) of CERCLA. In addition to this, the Navy publishes an HPS-specific quarterly newsletter for the local community entitled *Environmental Clean-Up News*.

Current Status

One of the three criteria for site deletion specifies that EPA may delete a site from the NPL if ▒responsible parties or other parties have implemented all appropriate response actions required.▒ EPA, with the concurrence of the State of California, believes that this criterion for this partial deletion has been met. The State of California concurs with the proposed deletion of Parcel A of the Treasure Island Naval Station - Hunter's Point Annex Site. Subsequently, EPA is proposing partial deletion of this Site from the NPL.

Department of Toxic Substances Control

Jesse R. Huff, Director
10151 Croydon Way, Suite 3
Sacramento, California 95827-2106

DD 19

Pete Wilson
Governor

Peter M. Rooney
Secretary for
Environmental
Protection

October 28, 1998

Mr. Daniel D. Opalski
Chief, Federal Facilities Cleanup Branch
United States Environmental Protection Agency
Region IX
75 Hawthorne Street, H-9
San Francisco, California 94105

Dear Mr. Opalski:

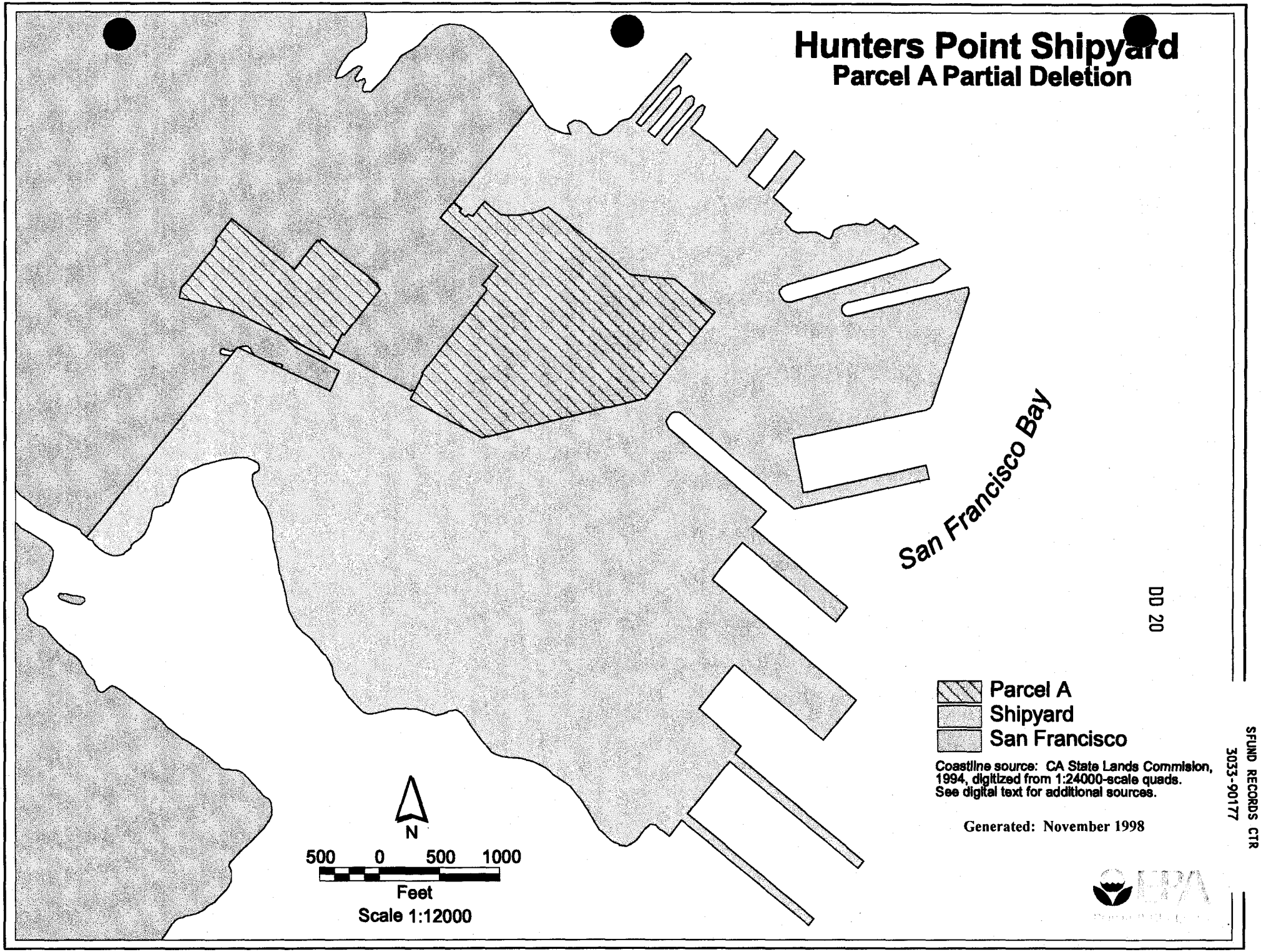
On June 30, 1998, the Department of Toxic Substances Control (DTSC) certified that the implementation of the Parcel A Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Record of Decision dated November 16, 1995, met the substantive requirements of the State's hazardous substance remediation statutes. It is our understanding that the Regional Water Quality Control Board is pursuing a deed notice for petroleum (non-CERCLA) contamination in the underlying groundwater.

On behalf of the State of California, DTSC concurs on the deletion of Parcel A of the Hunters Point Shipyard Superfund Site from the National Priorities List.

If you have any questions about this matter, please contact me at (916)-255-3565.

Sincerely,

Anthony J. Landis, P.E.
Chief
Northern California Operations
Office of Military Facilities



DEPARTMENT OF THE NAVY
ENGINEERING FIELD ACTIVITY, WEST
NAVAL FACILITIES ENGINEERING COMMAND
900 COMMODORE DRIVE
SAN BRUNO, CALIFORNIA 94066-5006

DD 21

IN REPLY REFER TO:

5090
Ser 6222JT/L9310-2
06 November 1998

From: Commanding Officer, Engineering Field Activity, West, Naval Facilities Engineering Command
To: Distribution

Subj: REVISED REPONSE TO COMMENTS ON DRAFT PARCEL A FOST AT HUNTERS POINT SHIPYARD (HPS), SAN FRANCISCO, CALIFORNIA

Encl: (1) Revised Response to Comments on HPS Draft Parcel A FOST

1. Enclosure (1) is the Revised Response to Agency and SFRA Comments dated 06 November 1998 on HPS Draft Parcel A FOST dated 24 June 1996. This document is a revised issue of our previously submitted Response to Agency and SFRA Comments on HPS Draft Parcel A FOST dated 03 June 1998.

2. Revision is made for response in submittal of 03 June 1998 on following comments; namely, (1) Item 2 Comment in SFDPH letter of 25 July 1996 and (2) Item 1 and Item 2 Comments in SFDPH letter of 14 November 1996. The previous responses to EPA and DTSC comments and other SFDPH comments are unchanged. We appreciate the assistance of EPA and SFRA enable us finalizing the revised responses. Please provide us with a letter of concurrence to the submitted revised response to comments.

3. We will submit the Draft Final Parcel A FOST for your review when we finalize the revised Parcel A boundary map and legal description that incorporate change of parcel boundaries to exclude Crisp Avenue and include Spear Street in the Parcel A.

4. If additional information is needed, please contact Mr. Jan-Nan Tuan, Engineer-in-Charge at (650) 244-2595 or FAX (650) 244-2654.

for RICHARD E. POWELL
By direction

Distribution:
U.S. Environmental Protection Agency, Region IX, San Francisco
(Attn: Ms. Claire Trombadore/2 copies)
State of California, Environmental Protection Agency, Dept of Toxic Substances Control, Berkeley (Attn: Mr. David Rist/Ms. Valerie Heusinkveld)
City of San Francisco, Department of Public Health, San Francisco
(Attn: Ms. Amy Brownell/2 copies)
City of San Francisco, City's Attorney's Office (Attn: Ms. Rona Sandler)
City of San Francisco, Public Utilities Commission, Bureau of Env. Regs. & Mgmt.
(Attn: Mr. John Mundy)

REVISED RESPONSE TO AGENCY COMMENTS
DRAFT FINDING OF SUITABILITY TO TRANSFER FOR PARCEL A
HUNTERS POINT SHIPYARD
SAN FRANCISCO, CALIFORNIA

This document presents the U.S. Department of the Navy's (Navy) revised responses to comments from the regulatory agencies and the City and County of San Francisco Department of Public Health (SFDPH) on the draft finding of suitability to transfer (FOST) for Parcel A at Hunters Point Shipyard (HPS), dated June 24, 1996. The comments addressed in this document were received from the U.S. Environmental Protection Agency (EPA) on July 24, 1996; the California Department of Toxic Substances Control (DTSC) on July 24, 1996; and SFDPH on July 25 and November 14, 1996. The original Navy responses were submitted to EPA, DTSC, and the SFPDH on June 3, 1998. At the request of the SFDPH, responses to several SFDPH comments pertaining to lead-based paint have been revised; responses to EPA and DTSC comments are unchanged. The revised responses to the SFDPH comments were developed by EPA and the Navy in a collaborative process.

RESPONSE TO COMMENTS FROM EPA

1. **Comment:** **Please provide the legal description for Parcel A and a figure showing property boundaries.**

   Response: The legal description will be included as Attachment 1 of the draft final Parcel A FOST. The property boundaries will be shown on Figure 1 of the draft final Parcel A FOST.

2. **Comment:** **Include a figure showing all subparcels and designating where subparcels N-1A, N-3A and S-46A lie.**

   Response: Figure 2 will be updated to show subparcels N-1A, N-3A, N-17A, and S-46A.

3. **Comment:** **Include a figure that overlays Figure 3 from the Parcel A Record of Decision (ROD), which shows SI and IR sites, with Figure 2 from the Parcel A FOST so that it is evident that the boundaries and subparcel category designations are correctly assigned.**

   Response: A mylar figure will be prepared to overlie Figure 2. The overlay will show the locations of the site inspection (SI) and installation restoration (IR) sites in Parcel A. The scale for Figure 2 will be changed to better depict Parcel A and more closely match Figure 3.

4. **Comment:** **Section 7.0 states that the deed for transfer will contain the notice required by CERCLA Section 120(h)(1), which provides notification of past storage. Please clarify whether the list provided in Section 7 is intended to provide notification of these substances. Please identify the location (EBS or FOST) where the list of substances can be found. Note that the list of substances should provide quantities stored, where known.**

Response: The Navy will provide language to comply with CERCLA 120(h) in the appropriate transfer documents. Section 6.0 of the draft Parcel A FOST discusses the notice of hazardous substances at Parcel A. Table 5 of the draft Parcel A FOST presents a list of hazardous substances found at Parcel A. Section 6.0 and Table 5 of the draft final Parcel A FOST will be updated to include information presented in the basewide environmental baseline survey (EBS), Revision 01, dated May 1, 1998. In addition, Table 6 will be added to the draft final Parcel A FOST. Table 6 will present a list of hazardous substances (and estimated quantities) found at Parcel A during a 1997 survey of Navy tenants. Quantities of hazardous substances were not recorded during previous surveys of Parcel A. The last sentence of Section 6.0 will be changed for clarification to state that "No information is available as to the quantities or length of time these substances were stored at Parcel A."

5. **Comment:** **EPA is currently drafting a letter to the Navy that references the Record of Decision for Parcel A as being the decision document which demonstrates that the Navy has complied with CERCLA Section 120(h)(3). The ROD documents that all necessary remedial actions have been taken at the site.**

Response: The Navy was notified in April 1998 that EPA had changed its position and would not submit a letter to the Navy designating the Parcel A Record of Decision (ROD) as the decision document that demonstrates that the Navy has complied with CERCLA Section 120(h)(3) and has taken all necessary remedial actions. EPA instead requested revision of Section 3.0 of the draft final Parcel A FOST to include this concurrence statement.

RESPONSE TO COMMENTS FROM DTSC

Specific Comments

1. **Comment:** **Page 2, Section 4.0, National Environmental Policy Act (NEPA) Compliance**

This section indicates that a joint Environmental Impact Statement (EIS)/Environmental Impact Report (EIR) is currently being prepared. When is the anticipated completion date of the EIS/EIR and how will this affect the transfer?

Response: The draft EIS/EIR was submitted on November 14, 1997, and is currently being revised to incorporate public review comments. The EIS/EIR, which supports the transfer of Parcel A, will be completed before the transfer of Parcel A.

2. **Comment:** <u>Page 2, Section 5.0, Environmental Baseline Survey Findings</u>

Sub-parcels are listed in this section are not shown on the map in Figure 2 nor in the Base-wide Environmental Baseline Survey. This section also states that sub-parcels have been identified (i.e., N-3A) and that they "can be categorized as DOD category 1 property." The DTSC has never received this evaluation and therefore is unable to concur with the findings in this section.

Response: Figure 2 has been updated to show subparcels N-1A, N-3A, N-17A, and S-46A. These subparcels are discussed in Chapter 5 of Revision 01 of the final basewide EBS (see Sections 5.1.1.12, 5.1.1.13, 5.1.1.14, and 5.1.1.15). The Department of Defense Environmental Condition of Property (ECP) area types were designated for complete subparcels to suit the City of San Francisco's reuse plan. The City of San Francisco delineated for the Navy the anticipated shape of the subparcels for reuse purposes. Table 7-1 of Revision 01 of the final basewide EBS lists the buildings and IR sites that are located in each subparcel, as well as the ECP area type and classification rationale for each subparcel. The final basewide EBS was submitted to the regulatory agencies on June 3, 1996; Revision 01 of this document was submitted on May 1, 1998.

3. **Comment:** <u>Page 4, Section 5.1.3, Storm Drain and Sanitary Sewer System</u>

Are there any remaining contaminated sediments in the storm drain system? Is the Navy going to monitor the storm drain system for hazardous constituents after the transfer?

Response: Sediments in the storm drain system at Parcel A were removed during system maintenance activities between August 1994 and April 1995. This removal is documented in the "Parcel A Storm Drain Monitoring Report" dated May 3, 1996. The Navy will not monitor the storm drain system at Parcel A after the transfer of the property.

3. **Comment:** <u>Page 6, Section 5.2.2, Lead-Based Paint</u>

The second sentence of this section states that "there are no state or local lead-based paint standards." This sentence should be rewritten because the State of California Department of Health Services does have published lead-based paint standards. Also, will these buildings be demolished after the parcel has been transferred?

Response: The sentence in Section 5.2.2 that states that there are no state standards for lead-based paint will be deleted. The Navy will not demolish any buildings at Parcel A prior to the transfer of Parcel A to the City of San Francisco. The City of San Francisco will be responsible for demolition of any buildings after the transfer of Parcel A.

4. **Comment:** **Page 7, Section 6.0, Notice of Hazardous Substances**

The first sentence indicates that the facility was established as an "active" facility in 1974. The word active should be changed to inactive.

Response: The word "active" will be changed to "inactive" in the first sentence of Section 6.0.

5. **Comment:** **Page 7, Section 7.0, Additional Deed Contents**

Please reference the 120(h)(3) letter that indicates that all remedial actions have been taken and include it as an attachment to this report.

Response: See response to EPA comment 5.

6. **Comment:** **Page 10, Figure 1**

Please include all figures that are part of the report.

Response: All figures are included in the draft final Parcel A FOST.

7. **Comment:** **Page 13, Attachment 1**

Please include all attachments that are part of the report.

Response: Attachment 1 to the Parcel A FOST is the legal description of Parcel A and will be included in the draft final Parcel A FOST.

RESPONSE TO COMMENTS FROM SFDPH

1. **Comment:** **We are concerned that there may be lead contamination in the soil surrounding the structures on Parcel A. Has the Navy ever investigated the possibility of lead contamination in the soil surrounding the houses and other structures?**

Response: In 1993, the Navy conducted a lead-based paint and soil survey in Parcel A. The results of this survey are documented in the August 1993 Tetra Tech report titled "Lead-Based Paint and Soil Sampling: Parcel 'A' Quarters, Hunters Point Naval Base." This report was sent to the SFDPH on August 22, 1996. Supplemental soil sampling for lead-based paint was conducted in 1997. The results of this supplemental sampling are presented in the March 1998 IT Corporation report titled "Parcel A Supplemental Soil Lead Sampling Report, Hunters Point Shipyard, San Francisco, California." The Navy forwarded a copy of this report to the SFDPH on May 6, 1998.

2. **Comment:** **We understand, as stated in Section 5.2.2, that the Navy does not intend to conduct a lead-based paint survey of the residential structures on Parcel A because the City intends to demolish these structures. However, the soil around the structures, which may have been contaminated by lead paint, will be left in place. The area is intended to be developed into residential housing and any lead contamination left in the soil could cause health problems for future residents.**

Response: Soil around residential structures on Parcel A was sampled during two lead-based paint surveys described in the 1993 Tetra Tech report and the 1998 IT Corporation report (see response to SFDPH comment 1 above). The surveys were designed according to the guidelines provided in Part II of the Federal Register, June 29, 1992, referred to as the Department of Housing and Urban Development (HUD) Notice of Funding Availability document (NOFA). The results of the two studies demonstrate that the average lead concentration in soil surrounding residential structures on Parcel A is 215 milligrams per kilogram (mg/kg), which is less than the EPA Region IX preliminary remediation goal (PRG) for residential soil of 400 mg/kg.

In addition, the average lead concentration of 215 mg/kg for soil at Parcel A is less than the residential cleanup goal derived for Parcel B of 221 mg/kg; the development of the 221 mg/kg cleanup goal is described in detail in the response to SFDPH November 1996 comment #1 shown below. Because the average Parcel A lead concentration of 215 mg/kg is below the PRG and the Parcel B cleanup goal, the Navy concludes that lead in soil at Parcel A does not pose a health risk to future residents on Parcel A. EPA reviewed the results of the lead-based paint surveys and concurred that the levels of lead in soil at Parcel A are protective of human health and require no further action; this concurrence was documented in a letter to the Navy dated April 27, 1998.

3. **Comment:** **We are aware that some lead soil tests were conducted as part of the Site Investigation and Remedial Investigation work on Parcel A. However, we were unable to find any evidence that a comprehensive lead testing program was conducted for the soil around the structures on Parcel A. Please provide us with any information you may have about lead soil testing around the structures or an explanation why lead soil testing was not conducted.**

Response: Results of all soil sampling and analyses conducted during the SI and remedial investigation (RI) of Parcel A are reported in the PRC Environmental Management, Inc. (PRC), documents "Draft Final Parcel A SI Report" and "Parcel A RI Report," published in October 1993 and September 1995, respectively. These reports have been reviewed by the regulatory agencies, which concur that soil sampling conducted during the SI and RI adequately characterized the nature and extent of lead and other contaminants at Parcel A.

In addition to soil sampling conducted during the SI and RI, soil around residential structures on Parcel A was sampled during the two lead-based paint surveys described in the 1993 Tetra Tech report and the 1998 IT Corporation report (see response to SFDPH comment 1 above). As described in the response to SFDPH comment 2 above, the results of these surveys demonstrate that levels of lead in soil at Parcel A do not pose a health risk to future residents.

RESPONSE TO SFDPH LETTER DATED NOVEMBER 14, 1996, REGARDING THE REPORT TITLED "LEAD-BASED PAINT AND SOIL SAMPLING: PARCEL 'A' QUARTERS"

1. **Comment:** **Our primary concern is that eight of thirty-four sample results exceed the Navy's human health risk assessment screening value for future residential areas. This screening value of 221 ppm lead is currently being used for Parcels B through F. Since Parcel A is the one area of the Shipyard dedicated to residential development, it should meet the criteria for the most protective human health risk assessment levels for residential areas, in this case, 221 ppm lead. Explain how the results that are above 221 ppm are protective of human health or are not of concern.**

Response: The lead soil data used to prepare the Parcel A human health risk assessment were screened against the 1995 EPA Region IX PRG for residential soil of 400 mg/kg. This PRG was calculated using EPA's 1994 Integrate Exposure Uptake Biokinetic Model (IEUBK Model) and addresses potential exposure to lead from the following pathways: dermal contact with soil; inhalation of dust; and ingestion of soil and drinking water. Based on the results of the Parcel A human health risk assessment and the RI, a no-action ROD was signed in November 1995 for Parcel A.

In 1996, the health-based cleanup goal for lead at Parcel B was developed using the EPA's IEUBK Model. For Parcel B, human health exposure pathways evaluated using the IEUBK Model consisted of dermal contact with soil; inhalation of dust; and ingestion of soil and drinking water. In addition, exposure to lead through the ingestion of homegrown produce was also evaluated during the Parcel B risk assessment at the request of HPS community members. The health-based cleanup goal for lead in soil at Parcel B calculated using the IEUBK Model is 221 mg/kg.

In early 1997, while reviewing the draft FOST for Parcel A, the Base Realignment and Closure Cleanup Team (BCT) discussed potential CERCLA releases from lead-based paint sources on Parcel A. The BCT was informed that in 1993, the Navy's compliance group had contracted out a lead-based paint survey for Parcel A. The results of this survey were shared with the BCT and are reported in the 1993 Tetra Tech document "Lead-Based Paint and Soil Sampling: Parcel 'A' Quarters, Hunters Point Naval Base." The survey was conducted throughout the former housing units and around the water tank at Parcel A. With the exception of two samples, lead levels in the soil samples were well below the EPA Region IX PRG of 400 mg/kg. The samples showing elevated lead levels were collected at the water tank and at former housing unit R-105.

In 1997, at EPA's request, the Navy agreed to resample these two areas. During the 1997 supplemental sampling event, high lead levels were not duplicated at residence R-105, and the average concentration of lead in the soil at the water tank was approximately one-tenth of the concentration reported for the water tank in 1993; these results are reported in the 1998 IT Corporation report titled "Parcel A Supplemental Soil Lead Sampling Report, Hunters Point Shipyard, San Francisco, California." The high concentrations of lead measured at the water tank and residence R-105 during the 1993 Tetra Tech survey may have been due to paint chips collected with the soil samples.

At the completion of the 1997 resampling event, the BCT reviewed all of the lead-based paint data for Parcel A (from both the 1993 and 1997 sampling events) and evaluated it with respect to the 221 mg/kg cleanup goal calculated for lead in the Parcel B RI. Although the 221 mg/kg lead cleanup goal had been calculated for Parcel B, EPA believed it was reasonable to use it to screen the Parcel A lead-based paint soil data, given that the proposed reuse for Parcel A is residential housing, which could include gardening and exposures to contaminants through homegrown produce.

Based on results from the soil samples collected during the 1997 sampling event, the average lead concentration near R-105 was 210 mg/kg, and the average lead concentration near the water tank was 287 mg/kg, only slightly above the 221 mg/kg level. EPA informed the Navy that it does not view the 221 mg/kg Parcel B cleanup goal as a "bright line" cleanup level and does not regard the small percentage of soil samples on Parcel A exceeding the 221 mg/kg for lead as a threat to human health. The average lead level in soils across Parcel A derived from both the 1993 and 1997 sampling events is 215 mg/kg. Therefore, given the data from both sampling events, the average value of lead in soil across Parcel A is protective and will not pose a risk to human health.

Because the average concentration of lead in soil across Parcel A is generally below the 221 mg/kg cleanup goal, the Navy believes that lead in soil at Parcel A does not pose a risk to human health and that no further action is required to protect human health. EPA concurred with this position in a letter to the Navy dated April 27, 1998.

2. **Comment:** **The sampling objectives and sampling design were not clearly defined. There appears to be no linking of sample locations with possible sources and no explanation given of why samples were taken in certain areas. There should have been more emphasis on characterization of building perimeters and other possible source areas. Composite samples from these source areas would have given a better overall picture of the lead in soil, rather than the few randomly placed discrete samples shown in the report. Please explain how the sampling locations and types of samples provide a characterization of the soil around the housing areas.**

Response: The objective of the 1993 Tetra Tech report titled "Lead-Based Paint and Soil Sampling: Parcel 'A' Quarters" was to present the results of a lead-based paint and soil survey for the housing units located in Parcel A. The survey was designed according to the guidelines provided by the HUD NOFA. The HUD NOFA guidelines apply to currently occupied housing units; since the Parcel A

residential units have not been occupied since the 1970s and are not likely to be reoccupied, the survey concentrated on soil surrounding the housing units and exterior painted surfaces. As stated in the survey report, the areas selected for survey were chosen to reflect the highest lead concentrations for the particular surveyed area; therefore, housing areas that showed visible paint cracks or paint peeling and that might be a source of lead were surveyed.

The Navy disagrees that composited samples would have provided a better overall picture of the lead in soil, although one composited sample was taken from the area surrounding the water tank at Parcel A during both the 1993 and 1997 soil sampling events. The Navy believes that lead in soil at Parcel A was adequately characterized during the 1993 and 1997 soil sampling events. Because the average concentration of lead in soil across Parcel A is below the 221 mg/kg cleanup goal, the Navy believes that lead does not pose a risk to human health at Parcel A. As previously stated, EPA concurred with this position.

3. **Comment:** **The sampling analyses were also cause for concern because of the small number of lab verified results. The XRF method for screening soil can result in a high level of deviation in the results. We also feel that the elevated result of 2,700 ppm was probably not "erroneous" as stated in your letter, but reflects the range of results that can be found in soil in locations where lead-based paint was used.**

Response: Supplemental soil sampling for lead-based paint was conducted in 1997 to address these concerns. Soil samples were collected at residence R-105, which was the location of the elevated result of 2,700 mg/kg (not R-103, which was a typographical error in Table 2 of the 1993 Tetra Tech report), as well as at the water tank area. Lead concentrations in the soil samples collected at residence R-105 confirm the original XRF values reported in the 1993 survey and demonstrate that the analytical result of 2,700 mg/kg was an erroneous value, which was likely the result of paint chips collected with the soil sample. Based on soil sampling data from the 1997 lead-based paint survey, the average lead concentration in the vicinity of residence R-105 is 210 mg/kg, and the average lead concentration in the water tank area is 287 mg/kg. The results of both the 1993 and 1997 surveys indicate that the average lead concentration in soil across Parcel A is 215 mg/kg, which is below the Parcel B residential cleanup goal of 221 mg/kg. Therefore, the Navy believes that lead in soil at Parcel A does not pose a risk to human health; EPA concurred with this position in a letter to the Navy dated April 27, 1998.

DD 22

Partial NPL Site Deletion Data Collection Form

(Version 1.0, March 1996)

Site Name: TREASURE ISLAND NAVAL STATION / HUNTERS POINT ANNEX

CERCLIS ID#: CA1170090087

Name of Deleted Portion: PARCEL A

Region: 9 State: CA

This form should be completed for all proposed deletions of releases at NPL sites. Include this form as part of the Notice of Intent to Delete (NOID) submitted to EPA Headquarters.

State, Tribal, and Site Identification Center
U.S. Environmental Protection Agency

Partial NPL Site Deletion Data Collection Form

General Form Instructions

The Partial NPL Site Deletion Data Collection Form is designed to standardize partial site deletion information for input into the Superfund NPL Assessment Program (SNAP) data base. This data base serves as a repository for general information about NPL sites and is used to respond to queries about NPL sites from a variety of sources including the general public, the media, other government agencies, and members of Congress. The primary source materials for completing this form are the Notice of Intent for Partial Deletion (NOID), site information supporting the decision to delete this portion of the site, and electronic locational data. Requirements for submitting electronic locational data are included in EPA's Locational Data Policy.

As you complete the Partial NPL Site Deletion Data Collection Form, keep the following points in mind.

- Please complete the form in ink, and print legibly.
- Use the most current level of information available (e.g., RI-level information has priority over HRS package-level information).
- Try to use the listed response options when answering a question, and use "unknown" and "other" responses ***only*** when absolutely necessary. If, however, the available response options for a question are not adequate to accurately describe the site, use the "other" response and provide a brief explanation in the space provided.
- Use the margins to explain responses that do not match listed response options or to provide clarifying information.

Please respond to ***all*** questions with the answer that you believe best represents the site conditions, given the information available at the time the NOID is prepared. Do ***not*** skip questions except where specifically directed to do so.

Information and Data Requirements for Partial Deletions

The State, Tribal, and Site Identification Center (Center) has distributed procedures on how to document partial site deletions. The data requirements are clearly outlined in those procedures, but also reiterated here.

The Regions are required to submit a NOID. This documentation provides useful information related to the site boundary and characteristics if coordinate information is deficient in the electronic version.

1. Basic Identifying Information

1.1 Site Name (as entered in CERCLIS): TREASURE ISLAND NAVAL STATION, HUNTERS POINT ANNEX

1.2 CERCLIS ID Number: CA1170090087

1.3 NPL Site Location: City: San Francisco State: CA
County: San Francisco Zip Code: 94124-2996

1.4 Name Given to Deleted Portion of the Site: _____

1.5 Is this the first, second, third, etc. partial deletion at the site? (Enter the deletion number): First

1.6 Name of Person(s) Completing Form: Claire D. Trombadore
Affiliation (agency/company): US EPA, Region 9, SFD82
Phone Number: 415-744-2409

1.7 Name of Person(s) Completing Electronic Locational Data: Kevin Hochstatter/ Cheryl Henley
Affiliation (agency/company): TetraTech EMI/ US EPA Region 9, PMD-10
Phone Number: (415) 222-8355 / (415) 744-1754

1.8 **BRIEF PARTIAL DELETION NARRATIVE.** Provide a brief narrative describing the location and extent of the release to be deleted. Include a discussion of the locational data and method(s) used to delineate the deleted release. Attach additional pages if necessary.

This proposal for partial deletion pertains to Parcel A, a portion the Treasure Island Naval Station - Hunters Point Annex, also known as the Hunters Point Naval Shipyard Superfund site (HPS). Parcel A consists of the upland areas of the Hunters Point Naval Shipyard Superfund site (HPS) and a fraction of the lowlands. Parcel A covers approximately 88 acres. It is bounded by the other portions of HPS and the Bayview-Hunters Point district of San Francisco. Parcel A boundaries extend up to Crisp St. and across Spear Ave. to the south, up to Griffith St. to the west, and up to Fisher Ave. and across Robinson St. and Galvez Ave. to the east. On the north, the Bayview-Hunters Point district of San Francisco is delineated from HPS by a fence. The proposed partial deletion pertains only to Parcel A of the HPS site and does not include Parcels B, C, D, E and F. Parcels B, C, D, E and F will remain on the NPL, and cleanup activities will continue at these parcels. A GIS map and the exact coordinates that define the Parcel A partial deletion are contained in the NPL deletion docket.

1.9 **PARTY REQUESTING DELETION.** Which party or parties requested the partial deletion (check all that apply):

- ☐ Developer
- ☐ Property Owner/Operator
- ☑ City/Municipality
- ☐ State
- ☐ Citizen group
- ☐ Other Interest group
- ☐ Individual
- ☐ EPA
- ☐ Other Federal program (specify) _____
- ☐ Other (specify) _____
- ☐ Unknown

1.10 **REASON FOR PARTIAL DELETION.** Which reason or reasons best justify the partial deletion (check all that apply):

- ☐ Contamination not found
- ☑ Cleaned up
- ☐ Deferred to RCRA
- ☐ Deferred to other Agency (specify) _____
- ☐ Incorrectly included in site boundaries
- ☐ Other (specify) _____

2. Partial Deletion Package Contents

2.1 Which of the following items has been provided in the partial deletion package?

Electronic	Hard Copy	
☑	☑	Notice of Intent to Delete (NOID)
☑	☑	Map of the entire site and deleted portion (scale included)

2.2 Which locational data fields have been provided in both electronic and printout form? (Check only the fields that apply) -(See text file (.txt) on diskette submitted to EPA HQ w/ GIS Map of site. Copy of map attached to this form.)

✓ Electronic	✓ Printout	
☐	☐	Projection of data
☐	☐	Units of measure
☐	☐	Projection spheroid
☐	☐	Projection zone (i.e., UTM 11 or State Plane Zone 1101 Maryland East)
☐	☐	Horizontal Datum
☐	☐	XShift/YShift
☐	☐	Source
☐	☐	Source Scale
☐	☐	Point-Line-Area
☐	☐	Method of collection
☐	☐	Description and structure of data and any attribute information
☐	☐	Accuracy value and unit
☐	☐	Xmin, Ymin, Xmax, Ymax of data layer
☐	☐	Precision of data
☐	☐	Source projection
☐	☐	Source units of measure
☐	☐	Source projection spheroid
☐	☐	Source horizontal datum

2.3 In what format(s) were the partial deletion electronic files submitted? (Check all that apply.)

- ☑ ARC/INFO native or export (.E00)
- ☐ ArcView shape files
- ☐ MapInfo native Map Info Interchange Format (MIF)
- ☐ MapInfo Boundary Interchange (MBI)
- ☐ MapInfo Map Interchange (MMI)
- ☐ GIS+ native
- ☐ AutoCAD DXF
- ☐ ASCII delimited file (include data structure and format for re-creation)

2.4 **NPL SITE COORDINATES.** Coordinates of the entire site should be provided in the form of polygons, starting with the northern-most coordinate and moving clockwise (in degrees, minutes, seconds, and thousandths of seconds):

1.	37 ° 44 · 12.901 "	North Latitude	122 ° 21 · 52.255 "	West Longitude
2.	37 ° 43 · 30.484 "	North Latitude	122 ° 21 · 19.851 "	West Longitude
3.	37 ° 42 · 29.891 "	North Latitude	122 ° 21 · 38.664 "	West Longitude
4.	37 ° 43 · 13.255 "	North Latitude	122 ° 22 · 55.975 "	West Longitude
5.	37 ° 43 · 39.668 "	North Latitude	122 ° 22 · 42.016 "	West Longitude
6.	37 ° 43 · 45.167 "	North Latitude	122 ° 22 · 27.902 "	West Longitude
7.	37 ° 43 · 47.429 "	North Latitude	122 ° 22 · 15.573 "	West Longitude

If thousandths of seconds are unknown, use "0" as a default value. If necessary, refer to Appendix E of EPA's 1991 PA guidance document for directions on how to determine coordinates.

2.5 **DELETED PORTION COORDINATES.** Coordinates of the deleted portion of the site should be provided in the form of polygons, starting with the northern-most coordinate and moving clockwise (in degrees, minutes, seconds, and thousandths of seconds):

1.	37 ° 43 · 47.429 "	North Latitude	122 ° 22 · 15.573 "	West Longitude
2.	37 ° 43 · 41.011 "	North Latitude	122 ° 21 · 46.533 "	West Longitude
3.	37 ° 43 · 33.634 "	North Latitude	122 ° 21 · 53.235 "	West Longitude
4.	37 ° 43 · 29.653 "	North Latitude	122 ° 22 · 09.942 "	West Longitude
5.	37 ° 43 · 39.668 "	North Latitude	122 ° 22 · 42.016 "	West Longitude
6.	37 ° 43 · 45.167 "	North Latitude	122 ° 22 · 27.902 "	West Longitude
7.	37 ° 43 · 33.178 "	North Latitude	122 ° 22 · 17.174 "	West Longitude

If thousandths of seconds are unknown, use "0" as a default value. If necessary, refer to Appendix E of EPA's 1991 PA guidance document for directions on how to determine coordinates.

2.6 What method was used to identify the NPL site and deleted portion coordinates? _____

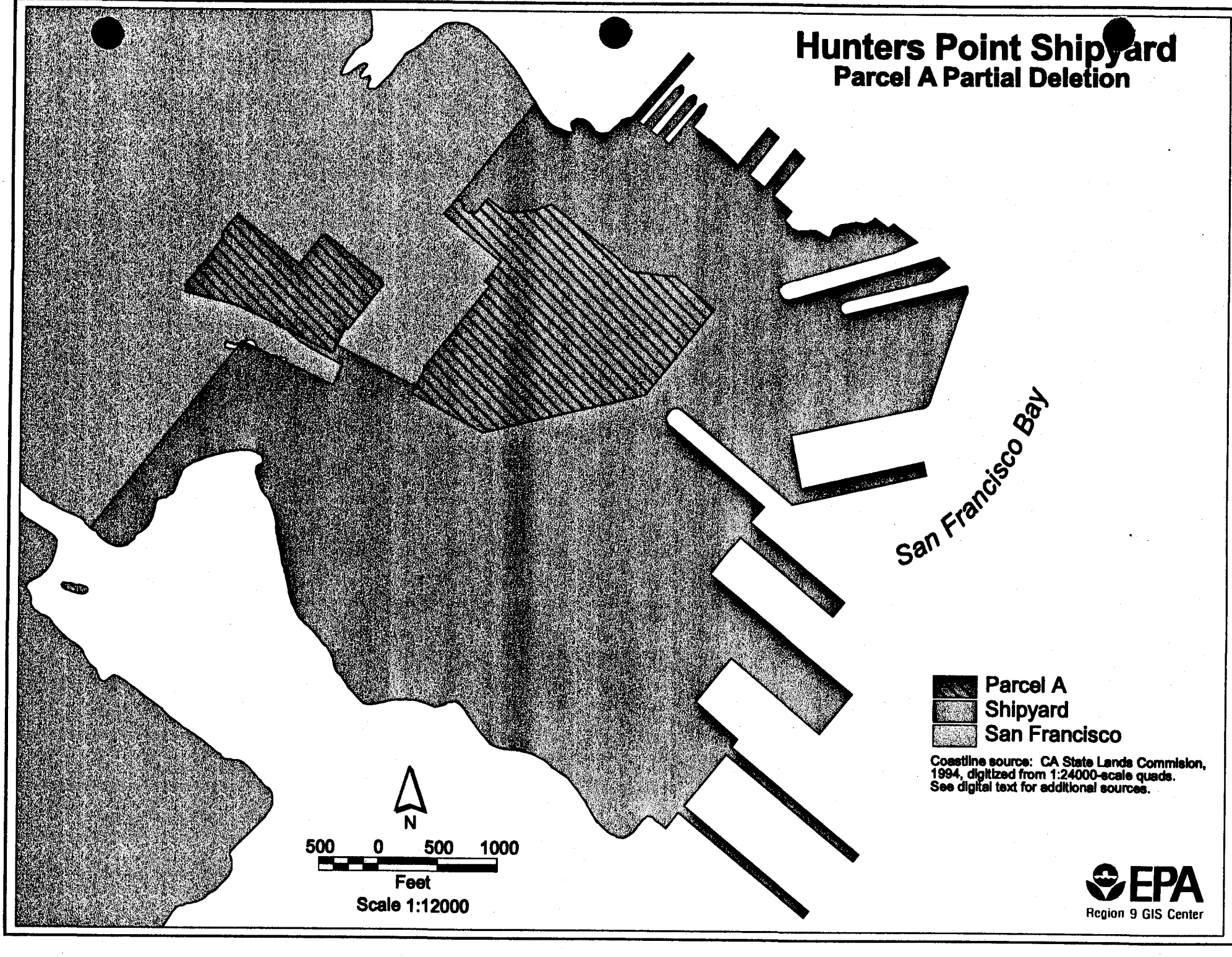
AUTO CAD FILE CONVERTED TO GIS. USED LATITUDE AND LONGITUDE INFO. TO POSITION SITE AND DELETED PORTION.

3. Dates

3.1 Date this Form Was Completed: 11/12/98 (mm/dd/yy)

3.2 Date Partial Deletion Proposed in FR: 12/98 (mm/dd/yy)

3.3 Date Partial Deletion Finalized in FR: TBD (mm/dd/yy)


Hunters Point Shipyard
Parcel A Partial Deletion
San Francisco Bay
Parcel A
Shipyard
San Francisco
Coastline source: CA State Lands Commision, 1994, digitized from 1:24000-scale quads. See digital text for additional sources.
N
500 0 500 1000
Feet
Scale 1:12000
EPA
Region 9 GIS Center

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

DD 23

November 25, 1998

MEMORANDUM

FROM: Claire Trombadore Karen Goldberg for Claire Trombadore

TO: File

SUBJECT: Hunter's Point Partial Deletion of Parcel A Close Out Report

On June 29, 1998 I received a telephone message from Raphael Gonzales, EPA HQ (703) 603-8892, stating that the No-Action ROD for Partial A is the equivalent of a Close-Out Report for purposes of Partial Deletion.